

EXHIBIT A

Brookdale – Brookhurst Facility

15302 Brookhurst St., Westminster, CA 92683

Access Compliance Evaluation Survey Barrier Report

Survey Date: June 19, 2019 / Report Date: August 5, 2021

Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
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Overview

Three-story facility with 102 assisted living and 15 memory care sleeping rooms, common areas and parking lot. The facility was originally constructed at a time that the 1998 CBC and 1991 ADA Standards for Accessible Design (ADAAG) standards applied. The inspection included all common areas, parking lot and all assisted living rooms to which I was permitted access.

Abbreviations

AFF	Above finish floor
ISA	International Symbol of Accessibility
PROW	Pedestrian right of way

Primary Building Main Entrance/Exit Porte Cochere with Six Guest/Visitor Parking Spaces

At least one accessible parking space is required in this lot, including at least one that is van accessible; two spaces are provided that are designated accessible, including one designated as van accessible

Double Designated Accessible Parking Space at Main Entrance

Left stall designated "VAN ACCESSIBLE"; Both designated "GUEST PARKING ONLY"

1	Tow Away Warning Signage	Does the tow away warning signage clearly state "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at ___ or by telephoning ___" with the appropriate contact information filled in as a permanent part of the sign?	11B-502.8.2	1129B.5	N/A	N/A	Barrier: A single tow away warning sign is posted at the lot entrance but does not include contact information and the wording is outdated, stating: "Unauthorized vehicles not displaying distinguishing placards or license plates issued for disabled persons will be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____" Barrier Removal: Remove and replace existing sign on existing standard using correct wording and appropriate contact information. Photos: 0793 & 0831
2	Surface characteristics	Is the surface of the parking stall stable, firm and slip resistant, free of gaps exceeding 1/2" in width, and free of changes in level, except for slopes not exceeding 1:48 (≈2.1%)?	11B-502.4	1129B.4.4	4.6.3	502.4	Barrier: The white portions of the pavement ISA symbol and border are stamped into the surface of the concrete at both parking stalls, creating multiple level changes of 1/8" or more. In addition, The surface slopes along the tail end of the parking stalls and access aisle measure 2.7% Barrier Removal: Remove and replace the concrete ISA symbols and the concrete along the rear of the parking stalls and access aisle. Photos: 0792 thru 0803

Perpendicular Curb Ramp between Accessible Parking Access Aisle and Main Entrance Approach

3	Running slope	Is the running slope not steeper than 1:12 (≈8.33%)?	11B-406.2.1	1127B.5.3	4.8.2	405.2	Barrier: Running slope measures up to 9.1% Barrier Removal: Remove and replace the curb ramp Photos: 0804 thru 0806
4	Side Flare slope	Are side flare slopes not steeper than 1:10 (10.0%)?	11B-406.2.2	1127B.5.3	4.7.5	406.3	Barrier: Side flare slopes measure 13.3% and 13.4% Barrier Removal: Remove and replace the curb ramp side flares Photos: 0808 thru 0812

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Primary Building Entrance/Required Exit

Low power double door with actuator plates inside and outside operating both door leaves

5	Tactile Exit Sign -	Is a tactile exit sign provided adjacent to the right side of the double door (viewed from the interior) and centered on an 18" x 18" clear floor space?	11B-216.4.1 & 1013.4	N/A	4.1.3. (16) (a)	216.4.1	Barrier: When an illuminated exit sign is required a tactile exit sign is also required. The required sign is not provided. Barrier Removal: Provide a tactile exit sign Photos: 0789, 0790 & 0817
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Rear Building Entrance/Exit with Parking Lot and Passenger Loading Zone

Parking lot comprising 24 parking spaces and one passenger loading zone. At least one accessible parking space is required in this lot, including at least one that is van accessible; four spaces are provided that are designated accessible, with none designated as van accessible. Note: construction documents require use of 32 spaces plus 33 additional spaces located off-site at the adjacent property. As such, this lot comprising 24 plus the 33 located off site number a total of 57 parking spaces provided in the lot, requiring at least two accessible parking spaces, including at least one that is van accessible (Reference "PROJECT ANALYSIS" Sheet # 0.10, dated 8/28/2000, submitted for plan check 11/22/1999).

Parking Lot

6	Tow Away Warning Signage	Is a tow away warning sign posted conspicuously at each entrance to the parking lot, or provided immediately adjacent to and visible from each accessible parking space?	11B-502.8	1129B.5	N/A	N/A	Barrier: There are three possible entrances to this parking area, two of which appear to be off-site. There is no tow away sign at any of the three entrances, including the East side entrance from Brookhurst St., which is on-site Barrier Removal: Provide signs posted conspicuously at each entrance, or immediately adjacent to and visible from each accessible parking space
7	Required Van Accessible Stalls	Is at least one of every six or portion thereof required accessible parking stalls van accessible? (Note: for ADAAG -at least one of every eight or portion thereof of provided accessible stalls)	11B-502.8	1129B.1	4.1.2 (5) (b)	208.2.4	Barrier: None provided Barrier Removal: Convert one existing standard designated accessible parking stall to van accessible by providing a van accessible sign below the ISA and create an adjacent access aisle that is at least 8'-0" wide. Photos: 0773

West Side Single Designated Accessible Parking Space

One of four such spaces at this location that are designated as accessible

8	Access Aisle	Is an access aisle provided adjacent to the accessible parking space?	11B-502.2	1129B.4.1	4.6.3	502.2	Barrier: No access aisle is provided. The area to the west side of the parking space is a structure and the area to the East side is a parking space Barrier Removal: Provide adjacent access aisle by applying surface markings and relocating parking as necessary Photos: 0735
9	Parking Space Width	Is the parking space at least 108 inches (9'-0") wide?	11B-502.2	1129B.4.1	N/A	N/A	Barrier: The space is delineated as 103" wide (8'-7"). Barrier Removal: Blackout surface striping and re-stripe to provide required width Photos: 0735, 0736, 0739
10	Surface Markings – ISA Symbol	Is the parking space marked with a min. 36" by 36" ISA in white on a blue background, centered within 6" of the width of the parking space and located at the rear of the space?	11B-502.6.4	1129B.51& 2	N/A	N/A	Barrier: ISA marking is not provided Barrier Removal: Provide surface painted ISA Photos: 0736

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11	Signage Placement - Height	Is the bottom of the identification sign at least 60" above the ground surface?	11B-502.6	N/A	N/A	502.6	Barrier: it is 49" high Barrier Removal: Raise the sign Photos: 0736
12	Surface characteristics	Is the surface of the parking stall stable, firm and slip resistant, free of gaps exceeding 1/2" in width, and free of changes in level, except for slopes not exceeding 1:48 ($\approx 2.1\%$)?	11B-502.4	1129B.4.4	4.6.3	502.4	Barrier: The surface slopes along the head end of the space and potential adjacent access aisle measure 6.0% at the concrete gutter. The overall length of the space and other parking spaces in the row is 17'-0" rather than the 18'-0" min. required by California standards. Therefore the concrete gutter must be included in the required length of the parking stall. Barrier Removal: Remove and replace the concrete gutter at the existing parking space and the adjacent proposed access aisle serving the parking space Photos: 0757 & 0758

Second from West Side Single Designated Accessible Parking Space

One of four such spaces at this location that are designated as accessible

13	Access Aisle	Is an access aisle provided adjacent to the accessible parking space?	11B-502.2	1129B.4.1	4.6.3	502.2	Barrier: No access aisle is provided. The areas to each side of the parking space are other parking spaces Barrier Removal: Provide adjacent access aisle by applying surface markings and relocating parking as necessary Photos: 0743
14	Parking Space Width	Is the parking space at least 108 inches (9'-0") wide?	11B-502.2	1129B.4.1	N/A	N/A	Barrier: The space is 90" wide (7'-6"). Barrier Removal: Blackout surface striping and re-stripe Photos: 0743, 0744, 0745
15	Surface Markings – ISA Symbol	Is the parking space marked with a min. 36" by 36" ISA in white on a blue background, centered within 6" of the width of the parking space and located at the rear of the space?	11B-502.6.4	11B-502.6.4	N/A	N/A	Barrier: No ISA marking is provided Barrier Removal: Provide surface painted ISA Photos: 0736
16	Surface characteristics	Is the surface of the parking stall stable, firm and slip resistant, free of gaps exceeding 1/2" in width, and free of changes in level, except for slopes not exceeding 1:48 ($\approx 2.1\%$)?	11B-502.4	1129B.4.4	4.6.3	502.4	Barrier: The surface slopes along the head end of the space and potential adjacent access aisle measure 9.6% at the concrete gutter. The overall length of the space and other parking spaces in the row is 17'-0" rather than the 18'-0" min. required by California standards. Therefore the concrete gutter must be included in the required length of the parking stall. Barrier Removal: Remove and replace the concrete gutter at the existing parking space and the adjacent proposed access aisle serving the parking space Photos: 0759 thru 0761

Third from West Side Single Designated Accessible Parking Space

One of four such spaces at this location that are designated as accessible

17	Access Aisle	Is an access aisle provided adjacent to the accessible parking space?	11B-502.2	1129B.4.1	4.6.3	502.2	Barrier: No access aisle is provided. The areas to each side of the parking space are other parking spaces Barrier Removal: Provide adjacent access aisle by applying surface markings and relocating parking as necessary, in order to maximize parking capacity, consider locating one access aisle between and serving two accessible parking spaces Photos: 0749
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18	Parking Space Width	Is the parking space at least 108 inches (9'-0") wide?	11B-502.2	1129B.4.1	4.6.3	502.2	Barrier: The space is 90-1/2" wide (7'-6-1/2"). Barrier Removal: Blackout surface striping and re-stripe Photos: 0747, 0748, 0749
19	Surface Markings – ISA Symbol	Is the parking space marked with a min. 36" by 36" ISA in white on a blue background, centered within 6" of the width of the parking space and located at the rear of the space?	11B-502.6.4	1129B.51&2	N/A	N/A	Barrier: No ISA marking is provided Barrier Removal: Provide surface painted ISA Photos: 0750
20	Surface characteristics	Is the surface of the parking stall stable, firm and slip resistant, free of gaps exceeding 1/2" in width, and free of changes in level, except for slopes not exceeding 1:48 (≈2.1%)?	11B-502.4	1129B.4.4	4.6.3	502.4	Barrier: The surface slopes along the head end of the space and potential adjacent access aisle measure 9.6% at the concrete gutter. The overall length of the space and other parking spaces in the row is 17'-0" rather than the 18'-0" min. required by California standards. Therefore the concrete gutter must be included in the required length of the parking stall. Barrier Removal: Remove and replace the concrete gutter at the existing parking space and the adjacent proposed access aisle serving the parking space Photos: 0765 & 0766

East Side Single Designated Accessible Parking Space

One of four such spaces at this location that are designated as accessible

21	Access Aisle	Is an access aisle provided adjacent to the accessible parking space?	11B-502.2	1129B.4.1	4.6.3	502.2	Barrier: No access aisle is provided. The areas to each side of the parking space are other parking spaces Barrier Removal: Provide adjacent access aisle by applying surface markings and relocating parking as necessary Photos: 0768, 0769 & 0771
22	Parking Space Width	Is the parking space at least 108 inches (9'-0") wide?	11B-502.2	1129B.4.1	4.6.3	502.2	Barrier: The space is 90" wide (7'-6"). Barrier Removal: Blackout surface striping and re-stripe Photos: 0750, 0751, 0752
23	Surface Markings – ISA Symbol	Is the parking space marked with a min. 36" by 36" ISA in white on a blue background, centered within 6" of the width of the parking space and located at the rear of the space?	11B-502.6.4	1129B.51&2	N/A	N/A	Barrier: None provided Barrier Removal: Provide surface painted ISA Photos: 0771
24	Parking Location	Is the space located on the shortest accessible route from parking to the entrance?	11B-208.3.1	1129B.4	4.6.2	208.3.1	Barrier: At least two non-accessible parking spaces are closer to the entrance (the first and third adjacent spaces to the West) Barrier Removal: Re-stripe parking so that the accessible spaces are the closest to the entrance Photos: 0773

Accessible Route between Designated Accessible Parking and Entrance

Includes the yellow hatched passenger loading zone access aisle

25	Running Slope	Is the slope of the route measured in the direction of travel no more than 1:20 (5.0%), or configured as a ramp?	11B-403.3	1133B.7.3	4.3.7	403.3	Barrier: The entire length of the hatched area has excessive running slope, measured up to 7.2% and lacks ramp features Barrier Removal: Provide asphalt overlay and surface striping Photos: 0777 thru 0784
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26	Detectable Warnings at Hazardous Vehicular Areas	Are detectable warnings provided where a walk crosses or adjoins a vehicular way and the walking surfaces are not separated by curbs, railings or other elements?	11B-247.1.2.5	1133B.8.5	N/A	N/A	Barrier: None provided between entrance and parking area Barrier Removal: Provide a line of surface applied truncated domes, 36" long in the direction of travel and fifteen feet wide. Photos: 0778

Passenger Loading Zone

Yellow hatched area in front of entrance – also serves as a portion of the accessible route between designated accessible parking spaces and the entrance

27	Surface characteristics	Is the surface of the space and access aisle stable, firm and slip resistant, free of gaps exceeding 1/2" in width, and free of changes in level, except for slopes not exceeding 1:48 (≈2.1%)?	11B-503.4	1131B.2.1	4.6.6	503.4	Barrier: The entire length of the hatched area has excessive slopes measured up to 7.2% Barrier Removal: Provide asphalt overlay and surface striping Photos: 0777 thru 0784
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Rear Building Entrance/Exit

Low power double door with actuator plates inside and outside operating both door leaves

28	Tactile Exit Sign	Is a tactile exit sign provided adjacent to the right side of the double door (viewed from the interior) and centered on an 18" x 18" clear floor space?	11B-216.4.1 & 1013.4	1117B.5.6.1	4.1.3. (16) (a)	216.4.1	Barrier: When an illuminated exit sign is required a tactile exit sign is also required. The required sign is not provided. Barrier Removal: Provide a tactile exit sign Photos: 0788 & 0789
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Aggregate Facility Aspects

In the interest of report brevity, this aspect is aggregated as described

29	Tactile Text and numerals at Permanent Identification Signage	Tactile characters are san-serif, and are neither italic, oblique, script, highly decorative, nor other unusual forms	11B-703.2.3	1117B.5.6.1	4.30.4	703.2.3	Barrier: Where tactile characters are provided at permanent identification signs, restroom wall signs and wall-mounted exit signs, they are of a text design that includes serifs. This item applies to all such signage at the facility. Barrier Removal: Remove and replace tactile signs Photos: 0002
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1st Floor Common Areas**Dining Room Main Entrance from Foyer/Required Exit**

Double fire door on magnetic hold-open devices

30	Identification Signage - Location	Is the tactile sign provided to the right of the right hand door at double doors with two active leaves, or if no wall space is available, at the nearest adjacent wall?	11B-703.4.2	1117B.5.9	4.30.6	703.4.2	Barrier: Space is available at the right side of the right hand door, however the sign is placed at the left side of the left hand door. Barrier Removal: Relocate sign Photos: 0002 & 0003
31	Tactile Exit Sign - Provided	Is a tactile exit sign provided adjacent to the right side of the double door (viewed from the dining room side) and centered on an 18" x 18" clear floor space?	11B-216.4.1 & 1013.4	1117B.5.6.1	4.1.3. (16) (a)	216.4.1	Barrier: When an illuminated exit sign is required a tactile exit sign is also required. The required sign is not provided. Barrier Removal: Provide a tactile exit sign Photos: 0016

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Dining Room

32	Dining/Work Surfaces	At dining / work surfaces is the required knee space, 30" wide x 27" high x 19" deep, provided?	11B-902.4	1122B.3	4.32.2 & 4.2.4 & 28 CFR § 36.201 (a)	902.4 & 28 CFR § 36.201 (a)	Barrier: There are eighteen non-fixed tables providing seventy-two total seats, requiring a min. of four accessible seating positions. The knee and toe clearances at all tables is partially obstructed by table bases Barrier Removal: Remove and replace two dining tables providing a total of four accessible seating positions Photos: 0018 thru 0021
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Dining Room Minor Entrance from Corridor/Required Exit

Double fire door on magnetic hold-open devices

33	Identification Signage - Location	Is the tactile sign provided to the strike side of a single door and centered on an 18" x 18" clear floor space that is provided beyond the arc of any door swing between the closed position and 45 degree open?	11B-703.4.2	1117B.5.9	4.30.6	703.4.2	Barrier: The door swings over the 18" x 18" clear floor space. Barrier Removal: Relocate the sign so that the centerline is at least 9" away from the door strike edge Photos: 0026
34	Tactile Exit Sign -	Is a tactile exit sign provided adjacent to the right side of the double door (viewed from the dining room side) and centered on an 18" x 18" clear floor space that is provided beyond the arc of any door swing between the closed position and 45 degree open?	11B-216.4.1 & 1013.4	1117B.5.6.1	4.1.3. (16) (a)	216.4.1	Barrier: When an illuminated exit sign is required a tactile exit sign is also required. The required sign is not provided. Barrier Removal: Provide a tactile exit sign Photos: 0022
35	Door Hardware Height	Are the operable parts of door hardware from 34" min. to 44" max. AFF?	11B-404.2.7	1133B.2.5.1	N/A	N/A	Barrier: The pull side handle is centered at 45-1/4" AFF Barrier Removal: Relocate hardware Photos: 0026 & 0028

Door to Courtyard from Dining Room

First of five entrances to the Courtyard. Automatic low power double door with interior and exterior actuators – both leaves active

36	Door Threshold	Is the threshold no higher than 1/2", and has a maximum vertical edge height of 1/4", and if higher than 1/4", the portion between 1/4" and 1/2" in height is beveled at 1:2 max.?	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: Overall threshold height is 1-3/16" high with a vertical edge of 3/4" high. Barrier Removal: Remove and replace threshold and exterior concrete door landing Photos: 0031 thru 0033 & 0041
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Door to Courtyard from Lobby

Second of five entrances to the Courtyard. Automatic low power double door with interior and exterior actuators – both leaves active

37	Door Maneuvering Area Surface	Are the required door maneuvering clearance areas stable, firm and slip resistant, free of excessive gaps, abrupt edges, and slopes exceeding 1:48 (≈2.1%)?	11B-302.2	1133B.2.4.2	4.13.6 & 28	302.2 & 28	Barrier: The gap between the tile and the metal threshold is 3/4" wide and over 1/4" deep and there is a bull-nosed shaped abrupt edge at the transition between the concrete and stamped concrete surfaces at the exterior maneuvering area that varies from 3/8" to 1/2" in height Barrier Removal: Fill gap between threshold and tile with epoxy and remove and replace a portion of the exterior door landing Photos: 0088 thru 0098
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Door to Courtyard from Corridor at East Side of Lobby

Third of five entrances to the Courtyard. Double door with both leaves active

38	Door operating Force	Is the opening force of the door not more than 5lbs?	11B-404.2.9.3 & 11B-108	1133B.2.5.1 & 1101B.3.1 & 2	N/A	N/A	Barrier: The opening force measured 12 lbs. at the East side door and 10 lbs. at the West side door Barrier Removal: Adjust the door closers Photos: 0104 & 0105
39	Door Threshold	Is the threshold no higher than 1/2", and has a maximum vertical edge height of 1/4", and if higher than 1/4", the portion between 1/4" and 1/2" in height is beveled at 1:2 max.?	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: Overall threshold height varies from 7/8" to 1" high with vertical edge of 1/2" high. Barrier Removal: Remove and replace threshold and exterior concrete door landing Photos: 0107 thru 0110

Door to Courtyard from Corridor at West Side of Lobby

Fourth of five entrances to the Courtyard. Double door with both leaves active

40	Door operating Force	Is the opening force of the door not more than 5lbs?	11B-404.2.9.3 & 11B-108	1133B.2.5.1 & 1101B.3.1 & 2	N/A	N/A	Barrier: The opening force measured 11 lbs. at the East side door and 12 lbs. at the West side door Barrier Removal: Adjust the door closers Photos: 0113 & 0114
41	Door Threshold	Is the threshold no higher than 1/2", and has a maximum vertical edge height of 1/4", and if higher than 1/4", the portion between 1/4" and 1/2" in height is beveled at 1:2 max.?	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: Overall threshold height varies from 1" to 1-1/8" high with vertical edge of 3/4" high. Barrier Removal: Remove and replace threshold and exterior concrete door landing Photos: 0116 thru 0119

Door to Courtyard from Corridor at West Side Near Room 125

Fifth of five entrances to the Courtyard. Double door with keypad operator -found locked during inspection

42	Door Threshold	Is the threshold no higher than 1/2", and has a maximum vertical edge height of 1/4", and if higher than 1/4", the portion between 1/4" and 1/2" in height is beveled at 1:2 max.?	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: Overall threshold height is greater than 1" and is shaped as a 1:1 bevel Barrier Removal: Remove and replace threshold and exterior concrete door landing Photos: 0129 thru 0132
43	Accessible Reach Range – Forward Approach	Are the operable parts of elements accessed by forward approach no higher than 48" above the surface of the clear space?	11B-308.2.1	1118B.5	4.2.5	308.2.1	Barrier: The keypad operator is required to unlock the door. It is mounted to allow only forward approach and the highest buttons are 51-1/4" above the clear space surface Barrier Removal: Relocate keypad Photos: 0125 & 0126

Courtyard Features

44	Overhead Hazards	Is a vertical clearance of min. 80" AFF provided at circulation areas, unless protected by a barrier?	11B-307.4	1121B.2	4.4.2 & 28 CFR §36.211	307.4 & 28 CFR §36.211	Barrier: Two umbrellas and three tree branches overhang circulation areas, reducing overhead clearance, varying from 71" to 75" above the surface of the ground Barrier Removal: Raise umbrellas and trim landscaping Photos: 0133 thru 0136 & 0141 thru 0144
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45	Dining/Work Surfaces	At dining / work surfaces is the required knee space, 30" wide x 27" high x 19" deep, provided?	11B-902.4	1122B.3	4.32.2 & 4.2.4 & 28 CFR § 36.201 (a)	902.4 & 28 CFR § 36.201 (a)	Barrier: There are five tables of two types offering a total of 22 seats (One seating six and four seating four each), requiring a minimum of two accessible seats. Table bases partially obstruct the knee and toe space at all locations Barrier Removal: Provide a table offering two accessible seating positions with the necessary knee and toe clearance Photos: 0052, 0055, 0057, 0061, 0062, 0066 & 0068

Private Dining Room**Entrance from Foyer - One of two entrances**

46	Identification Signage - Location	Is the tactile sign provided to the strike side of a single door and centered on an 18" x 18" clear floor space that is provided beyond the arc of any door swing between the closed position and 45 degree open?	11B-703.4.2	1117B.5.9	4.30.6	703.4.2	Barrier: The sign is located at the latch side however is too far away from the door Barrier Removal: Relocate the sign to the glazing panel so that it is closer to the door Photos: 0145
47	Door operating Force	Is the opening force of the fire door not more than required by the administrative authority but in no case no more than 15lbs?	11B-404.2.9.3 & 11B-108	1133B.2.5.1 & 1101B.3.1 & 2	4.13.11 & 28 CFR §36.211	404.2.9 & 28 CFR §36.211	Barrier: The opening force measured 17 lbs. Barrier Removal: Adjust the door closer to the minimum required by the administrative authority and no more than 15 lbs. Photos: 0145 & 0146

Private Dining Room**Seating/Work Surface**

Library Counter/Sink							
48	Work Counter – Height	Is the height of the work counter not more than 34" above the floor?	11B-902.3	1122B.4	4.32.4	902.3	Barrier: The height of the counter is more than 34" above the floor; measured at 35-1/2" AFF. Barrier Removal: Provide a counter not more than 34" high above the floor. Photos: 0164 & 0165
49	Soap/Sanitizer Dispenser – Height	Is the operable part provided with a forward approach no higher than 48" AFF?	11B-308.2.1	1118B.5	4.2.5	308.2.1	Barrier: The operable part of the dispenser is 51-1/2" AFF with a clear space positioned for forward approach Barrier Removal: Relocate the surface-mounted dispenser Photos: 0166
50	Sink - Rim Height	Is the height of the sink rim no more than 34" AFF?	11B-606.3	N/A	4.24.2	606.3	Barrier: The height of the sink rim is more than 34" above the floor; measured at 35-1/2" AFF Barrier Removal: Modify existing counter or replace to provide a counter/sink not more than 34" high above the floor Photos: 0164 & 0165
51	Sink – Knee and Toe Clearance	Is the required knee and toe space, 30" wide x 27" high x 19" deep, provided?	11B-606.2	N/A	4.24.3	606.2	Barrier: None provided – the base cabinet has a raised bottom platform located under the sink that obstructs knee and toe clearance Barrier Removal: Modify base cabinet to provide the required knee and toe clearances Photos: 0164 & 0168

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Survey Date: June 19, 2019 / Report Date: August 5, 2021

Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
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Activity Room Minor Entrance

Fire door at North side of Activity Room at corridor - found held open with magnetic hold open device

52	Door – Closing Speed	Is the closing speed of the door not less than 5-seconds?	11B-404.2.8	N/A	4.13.10 & § 36.211	404.2.8 & § 36.211	Barrier: The closing speed is less than 5-seconds; measured at 2.5 seconds. Barrier Removal: Adjust the door closer as required so the closing speed is not less than 5-seconds. Photos: 0178, 0183, 0185 & 0187
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Activity Room

53	Work Counter - Height	Is the height of the work counter not more than 34" above the floor?	11B-902.3	1122B.4	4.32.4	902.3	Barrier: The height of the counters are more than 34" above the floor; measured at 36" to 36-1/2" AFF Barrier Removal: Provide a counter not more than 34" high above the floor. Photos: 0172 thru 0175
54	Sink - Rim Height	Is the height of the sink rim no more than 34" AFF?	11B-606.3	N/A	4.24.2	606.3	Barrier: The height of the sink rim is more than 34" above the floor; measured at 36-1/2" AFF Barrier Removal: Modify existing counter or replace to provide a counter/sink not more than 34" high above the floor Photos: 0173 & 0175
55	Sink – Knee and Toe Clearance	Is the required knee and toe space, 30" wide x 27" high x 19" deep, provided?	11B-606.2	N/A	4.24.3	606.2	Barrier: None provided – the base cabinet has a raised bottom platform located under the sink that obstructs knee and toe clearance Barrier Removal: Modify base cabinet to provide knee and toe clearances Photos: 0174
56	Dining/Work Surfaces	At dining / work surfaces is the required knee space, 30" wide x 27" high x 19" deep, provided?	11B-902.4	1122B.3	4.32.2 & 4.2.4 & 28 CFR § 36.201 (a)	902.4 & 28 CFR § 36.201 (a)	Barrier: There are three non-fixed tables providing twelve total seats, requiring a min. of one accessible seating position. The knee and toe clearances at all tables is partially obstructed by table bases Barrier Removal: Remove and replace one table providing at least one accessible seating position Photos: 0170 & 0183

All-Gender single Accommodation Restroom at Dining Room at South Side (Room 127 on Building Plans)

57	Signage – Geometric Symbol Door Sign	Is a compliant geometric symbol door sign in a color that contrasts with the door provided?	11B-703.7.2.6.2	1115B.5	NA	NA	Barrier: The geometric symbol door sign is not provided. Barrier Removal: Provide a geometric symbol door sign with a light-colored triangle within a dark colored circle on the light-colored door. Photos: 0606
58	Toilet – Clear Space at Toilet	Is a minimum 48" long clear space provided in front of the toilet?	11B-604.3.1 and 11B-108	1115B.7.2 and 1101B.3.1 & 2	N/A	N/A	Barrier: The clearance is provided to the wall however at the time of my inspection I found it partially obstructed by a non-fixed waste receptacle. Barrier Removal: Remove the movable waste receptacle –there is a built-in receptacle installed in this restroom. Photos: 0610
59	Toilet – Clear Space at Toilet	Is the clear space provided between the toilet and adjacent lavatory at least 28"? (1998 CBC requirement). Is the clear space provided a min. 42" wide measured from centerline of toilet? (Pertinent to ADAAG).	11B-604.3.1	1115B.7.2	4.16.2 &	604.3.1	Barrier: The clear space is less than 60" measured perpendicular to the side wall adjacent the toilet; measured at 47" to the lavatory. The distance between the toilet and lavatory is less than 28"; measured at 20.75". Barrier Removal: Relocate the toilet and surrounding fixtures to provide the required clear space. Photos: 0608, 0609, 0629 & 0630

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60	Toilet - Location of Flush Valve	Is the flush valve located at the wide (i.e., open) side of the toilet area?	11B-604.6	1502.0	4.16.5	604.6	Barrier: The flush valve is located at the wall side of the toilet area rather than the wide side. Barrier Removal: Replace flush tank with one with the flush valve handle located at the wide side. Photos: 0608 & 0618
61	Grab Bar – Unobstructed Gripping Surface	Is the area minimum 12" above the grab bar and minimum 1.5" below and at sides of the grab bar clear of projecting elements?	11 B-609.3	1133B.4.2.5, 1133B.5.5.1 & Fig. 11B-36	4.26.2	609.3	Barrier: The area above the side grab bar is not clear; a projecting surface-mounted seat cover dispenser is located 7.5" above the top of the grab bar. Barrier Removal: Relocate the dispenser to another area of the room. Photos: 0608 & 0617
62	Restroom Accessories – Reach Range	Are restroom accessories mounted within accessible reach range? For CBC: are restroom accessories mounted so that the highest operable part is not more than 40" above the floor?	11B-603.5	1115B.9.2	4.2.6 & Figure 6(c)	308.3.2	Barrier: The height to the outlet of the seat cover dispenser is beyond accessible reach range for a side reach approach over an obstruction; measured at 45" AFF and greater than the maximum allowed reach over an obstruction of 24". Barrier Removal: Relocate the dispenser. Photos: 0609 & 0615
63	Restroom Accessories – Height of Operable Parts	Are restroom accessories mounted so that the highest operable part is not more than 40" above the floor?	11B-603.5	1115B.9.2	NA	N/A	Barrier: The height to the outlet of the paper towel dispenser is more than 40" above the finish floor; measured at 46" AFF. Barrier Removal: Relocate the paper towel dispenser. Photos: 0609 & 0615

All-Gender single Accommodation Restroom at Dining Room at North Side (Room 128 on Building Plans)

64	Signage – Geometric Symbol Door Sign	Is a compliant geometric symbol door sign in a color that contrasts with the door provided?	11B-703.7.2.6.2	1115B.5	NA	NA	Barrier: The geometric symbol door sign is not provided. Barrier Removal: Provide a geometric symbol door sign with a light-colored triangle within a dark colored circle on the light-colored door. Photos: 0 632
65	Door – Closing Speed	Is the closing speed of each door leaf not less than 5-seconds?	11B-404.2.8 & 11B-108	N/A	4.13.10 & 28 CFR §36.211	404.2.8 & 28 CFR §36.211	Barrier: The closing speed of each door leaf is less than 5-seconds; measured at 2.5 seconds. Barrier Removal: Adjust the door closer as required so the closing speed is not less than 5-seconds. Photos: 0637
66	Door – Pull Side Maneuvering Clearance	Is the pull side maneuvering space, measured as the width of the door x 60" minimum perpendicular to the door in the closed position? Is the space level, not more than 1:48 in any direction?	11B-404.2.4	1133B.2.4.2 & Fig. 11B-26A & B	4.13.6	404.2.4	Barrier: The pull side maneuvering space is partially obstructed by the surface mounted paper towel dispenser, which protrudes 6" into the required clearance, beginning 45.5" away. Barrier Removal: Relocate the paper towel dispenser. Photos: 0639, 0641 thru 0643 & 0645
67	Toilet – Clear Space at Toilet	Is a minimum 48" long clear space provided in front of the toilet?	11B-604.3.1 and 11B-108	1115B.7.2 and 1101B.3.1 & 2	N/A	N/A	Barrier: The clearance is provided to the wall however at the time of my inspection I found it partially obstructed by a non-fixed waste receptacle. Barrier Removal: Remove the movable waste receptacle –there is a built-in receptacle installed in this restroom Photos: 0644 thru 0646
68	Toilet – Clear Space at Toilet	Is the clear space provided between the toilet and adjacent lavatory at least 28"? (1998 CBC requirement). Is the clear space provided between the toilet a minimum of .42" wide measured from centerline of toilet? (ADAAG requirement).	11B-604.3.1	1115B.7.2	4.16.2 & Fig. 28	604.3.1	Barrier: The clear space is less than 60" measured perpendicular to the side wall adjacent the toilet; measured at 46.25" to the lavatory. The distance between the toilet and lavatory is less than 28"; measured at 21.75". Barrier Removal: Relocate the toilet and surrounding fixtures to provide the required clear space.. Photos: 0633, 0634, 0651 & 0652

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69	Restroom Accessories – Height of Operable Parts	Are restroom accessories mounted so that the highest operable part is not more than 40" above the floor?	11B-603.5	1115B.9.2	NA	N/A	Barrier: The height of the soap dispenser is more than 40" above the finish floor; measured at 48" AFF. Barrier Removal: Relocate the soap dispenser Photos: 0653
70	Restroom Accessories – Height of Operable Parts	Are restroom accessories mounted so that the highest operable part is not more than 40" above the floor?	11B-603.5	1115B.9.2	NA	N/A	Barrier: The height to the outlet of the paper towel dispenser is more than 40" above the finish floor; measured at 46.5" AFF. Barrier Removal: Relocate the paper towel dispenser. Photos: 0633 & 0656

North Side Western Entrance/Required Exit at Parking

71	Tactile Exit Sign -	Is a tactile exit sign provided adjacent to the right side of the double door (viewed from the interior side) and centered on an 18" x 18" clear floor space that is provided beyond the arc of any door swing between the closed position and 45 degree open?	11B-216.4.1 & 1013.4	1117B.5.6.1	4.1.3. (16) (a)	216.4.1	Barrier: When an illuminated exit sign is required a tactile exit sign is also required. The required sign is not provided. Barrier Removal: Provide a tactile exit sign Photos: 0658
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North Side Eastern Required Exit at Stair #4

72	Tactile Exit Sign -	Is a tactile exit sign provided adjacent to the right side of the double door (viewed from the interior side) and centered on an 18" x 18" clear floor space that is provided beyond the arc of any door swing between the closed position and 45 degree open?	11B-216.4.1 & 1013.4	1117B.5.6.1	4.1.3. (16) (a)	216.4.1	Barrier: When an illuminated exit sign is required a tactile exit sign is also required. The required sign is not provided. Barrier Removal: Provide a tactile exit sign Photos: 0659 & 0650
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Country Store

73	Door - Clear Width	Is the clear width of the door in the 90 degree open position at least 32"?	11B-404.2.3	113B.2.2	4.13.5	404.2.3	Barrier: The clear width is not at least 32", measured at 27.75". Barrier Removal: Remove and replace door and frame and replace with wider door and frame. Photos: 0820 thru 0822
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Second Floor Foyer Library

74	Dining/Work Surfaces	At dining / work surfaces is the required knee space, 30" wide x 27" high x 19" deep, provided at the required number of seating positions?	11B-902.4	1122B.3	4.32.2 & 4.2.4 & 28 CFR § 36.201 (a)	902.4 & 28 CFR § 36.201 (a)	Barrier: There is one non-fixed table. The knee and toe clearance is partially obstructed by the table base. Barrier Removal: Remove and replace or modify existing table to provide at least one accessible seating position with the required knee and toe clearance. Photos: 0552 & 0553
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Second Floor Foyer Health and Wellness Office

75	Dining/Work Surfaces	At dining / work surfaces is the required knee space, 30" wide x 27" high x 19" deep, provided at the required number of seating positions?	11B-902.4	1122B.3	4.32.2 & 4.2.4 & 28 CFR § 36.201 (a)	902.4 & 28 CFR § 36.201 (a)	Barrier: There is one non-fixed table. The knee and toe clearance is partially obstructed by the table base. Barrier Removal: Remove and replace or modify existing table to provide at least one accessible seating position with the required knee and toe clearance Photos: 0558
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Second Floor Spa

76	Door – Closing Speed	Is the closing speed of each door leaf not less than 5-seconds?	11B-404.2.8 & 11B-108	N/A	4.13.10 & 28 CFR §36.211	404.2.8 & 28 CFR §36.211	Barrier: The closing speed is less than 5-seconds; measured at 2.0 seconds. Barrier Removal: Adjust the door closer as required so the closing speed is not less than 5-seconds. Photos: 0581 & 0582
77	Lavatory – Protection	Are water supply and drain pipes under lavatories insulated or otherwise configured to protect against contact?	11B-606.5	1504.2.2	4.19.4	606.5	Barrier: The cold water supply and a portion of the drain piping are not insulated or protected from contact. Barrier Removal: Insulate piping. Photos: 0579

Second Floor Restroom

78	Signage – Geometric Symbol Door Sign	Is a compliant geometric symbol door sign in a color that contrasts with the door provided?	11B-703.7.2.6.2	1115B.5	NA	NA	Barrier: The geometric symbol door sign is not provided. Barrier Removal: Provide a geometric symbol door sign with a light-colored triangle within a dark colored circle on the light-colored door. Photos: 0583
79	Door – Closing Speed	Is the closing speed of each door leaf not less than 5-seconds?	11B-404.2.8 & 11B-108	N/A	4.13.10 & 28 CFR §36.211	404.2.8 & 28 CFR §36.211	Barrier: The closing speed of each door leaf is less than 5-seconds; measured at 2.0 seconds. Barrier Removal: Adjust the door closer as required so the closing speed is not less than 5-seconds. Photos: 0583 & 0584
80	Toilet – Clear Space at Toilet	Is the clear space provided between the toilet and adjacent lavatory at least 28"? (1998 CBC requirement). Is the clear space provided a minimum of .42" wide measured from centerline of toilet? (Pertinent to ADAAG).	11B-604.3.1	1115B.7.2	4.16.2 & Fig. 28 – see note at right	604.3.1	Barrier: The clear space is less than 60" measured perpendicular to the side wall adjacent the toilet; measured at 52.5" to the lavatory. The distance between the toilet and lavatory is less than 28"; measured at 25.75". In addition, the clear space is obstructed by a non-fixed table. Barrier Removal: Relocate the toilet and surrounding furniture to provide the required clear space. Photos: 0587 thru 0590
81	Toilet - Location of Flush Valve	Is the flush valve located at the wide (i.e., open) side of the toilet area?	11B-604.6	1502.0	4.16.5	604.6	Barrier: The flush valve is located at the wall side of the toilet area rather than the wide side. Barrier Removal: Replace flush tank with one with the flush valve handle located at the wide side. Photos: 0593
82	Grab Bar - Height	Are grab bars located: at at 33" AFF to centerline? (1998 CBC requirement) and 33" to 36" AFF to centerline? (ADAAG requirement)	11B-609.4	1115B.8.1	4.17.6 & Fig. 29 & 30	609.4	Barrier: The height of the side grab bar is 31.5" to top of gripping surface (31" to centerline). Barrier Removal: Relocate the grab bar to conform to current CBC and ADA standards. Photos: 0591 & 0597

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83	Side Grab Bar – Location	Does the side grab bar extend a minimum of 24" in front of the toilet? (1998 CBC). Does the side grab bar begin a maximum of 12" from the rear wall?	11B-604.5.1	1115B.8.1	4.17.6 & Fig. 29 & 30	604.5.1	Barrier: The Side grab bar does not extend a minimum of 54" from the rear wall, nor extend a minimum of 24" in front of the toilet; measured at 49.5" from the rear wall, extending 19.5" in front of the toilet. Barrier Removal: Relocate the grab bar to conform to current CBC and ADA standards. Photos: 0591 & 0598

Third Floor Resident Laundry - Room 336 on Building Plans

84	Lavatory - Clear Floor Space	Is there a clear floor space positioned for a front approach to the lavatory?	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: A clear floor space positioned for a front approach is not provided; a base cabinet encroaches into the required clear space. Barrier Removal: Modify, remove or replace the base cabinet. Photos: 0537
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Rolling Stock

Large facility shuttle with automatic lift. California License 01622U1. Provides space for two wheelchairs and occupants and 12 regular seats. There is no space provided for storing mobility devices. Refer to photos 661 through 690

Part II: Resident units

I inspected the 8 assisted living resident units that I was permitted to inspect in the order specified below. I was not permitted to inspect any memory care units.

1. Room 305 – Vacant Two Bedroom
2. Room 304 – Vacant One Bedroom
3. Room 315 – Vacant One Bedroom
4. Room 325 – Vacant Studio
5. Room 317 – Vacant Studio Sales Model
6. Room 336 – Vacant Studio
7. Room 215 – Vacant One Bedroom
8. Room 103 – Occupied One Bedroom

Long-Term Care Facilities are covered under both the Americans with Disabilities Act (1991 ADAAG & 2010 ADAS) and the California Building Code, Chapter 11B (1998 CBC & 2019 CBC)

The United States Center for Disease Control defines Long-Term Care Facilities as follows:

Nursing homes, skilled nursing facilities, and assisted living facilities, (collectively known as long-term care facilities, LTCFs) provide a variety of services, both medical and personal care, to people who are unable to manage independently in the community.

Applicable Standards and Codes for Scoping**CBC 2019**

11B-223.3 Long-term care facilities. In licensed long-term care facilities, including skilled nursing facilities, intermediate care facilities and nursing homes, at least 50 percent, but no fewer than one, of each type of patient bedroom or resident sleeping room shall be provided with mobility features complying with Section 11B-805.

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CBC 1998

1109B.3 Patient Bedrooms and Toilet Rooms. 1. Long-term care facilities, including skilled nursing facilities, intermediate care facilities, bed and care, and nursing homes shall have at least 50 percent of patient bedrooms and toilet rooms and all public-use and common-use areas, accessible.

2010 ADAS

223.3 Long-Term Care Facilities. In licensed long-term care facilities at least 50 percent, but no fewer than one, of each type of patient bedroom or resident sleeping room shall be provided with mobility features complying with 805.

1991 ADAAG**6.1 General.**

(3) Long term care facilities, nursing homes – At least 50 percent of patient bedrooms and toilets, and all public use and common use areas are required to be designed and constructed to be accessible.

Federal Regulation Obligation in absence of Specific Standards.

In addition, there are aspects of the rooms that are required to be accessible in order to fulfill the general obligations for accessibility under ADA implementing regulations that are not addressed by specific standards. In the absence of specific standards, a public accommodation must nonetheless ensure accessibility of such aspects by way of utilizing other guidance materials. In this case I have relied upon building block accessibility technical provisions, such as accessible reach ranges and minimum clearances for example, or similar standards to the extent that they apply in context:

28 CFR § 36.201 General. (a) Prohibition of discrimination. No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any private entity who owns, leases (or leases to), or operates a place of public accommodation.

Room 305 – Vacant Two Bedroom

Designated as Unit-A2 on building plans at 728 SF, including one large bedroom with a window, a smaller bedroom (referred to as “Den” on plans and in following) with access to the balcony and a living room and wet bar in between with access to the same balcony. There is a bathroom with roll-in shower within both the Bedroom and the Den. The bathrooms are of similar size and configuration; however the den bathroom is slightly larger.

85	Door – Hardware Use at Unit Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the deadbolt lock requires pinching and twisting of the wrist to operate. Barrier Removal: provide an additional deadbolt with accessible handle. Photos: 0191 & 0193
86	Door – Peephole Height at Unit Entrance	Are door vision panels no higher than 43” AFF?	11B-404.2.11	N/A	28 CFR § 36.202	404.2.11	Barrier: The peephole is located too high to be usable by a person in a wheelchair or of low stature, measured at 59.5” AFF. Barrier Removal: add an additional peephole below the existing peephole. Photos: 0191 & 0192
87	Controls - Height of Blinds Control at Living Room Balcony Door	Is the control accessed by a parallel approach no higher than 54” AFF as required by the 1998 CBC and ADAAG?.	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window covering control is located higher than 54” AFF; measured at 63.75 AFF. Barrier Removal: provide longer wand(s) to extend down to within maximum height above the floor level. Photos: 277 & 278

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88	Door – Clear Width at Living Room Sliding Balcony Door	Is the minimum clear width at the sliding door 32" minimum?	11B-404.2.3	1133B.2.2	4.13.5	404.2.3	Barrier: The clear width is less than 32", measured at 30.75" because a bumper prevents the door from opening fully. Barrier Removal: modify or replace bumper so that the door can open to the extent that it provides minimum 32" clear. Photos: 0284 thru 0286
89	Door – Threshold Height at Living Room Sliding Patio/Balcony Door	Is the threshold no more than ½" higher than the floor level at either side? (pertinent to 1998 and 2019 CBC and 2010 ADA) ¾" at exterior sliding doors? (pertinent to ADAAG).	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: The sliding door threshold track is higher than ¾", measured at 2.125" comprising vertical edges at each side. Barrier Removal: Remove and replace the sliding door and frame with one with a semi recessed bottom track, or alternately, replace the sliding door with a pair of swinging doors with a standard threshold. Photos: 0287 thru 0289
90	Door – Hardware Height at Living Room Sliding Patio/Balcony Door	Is the door hardware located no higher than 44" AFF? (2019 CBC) and 48" AFF? (1998 CBC, ADAAG and 2010 ADA).	11B-404.2.7	1118B.5 & 6	4.2.5 & 6	404.2.7	Barrier: The sliding door hardware is higher than 44" AFF, measured at 50.5" AFF". Barrier Removal: relocate sliding door hardware on existing door. Photos: 0279 & 0280
91	Coat Hook – Height at Den	Is the element accessed by a parallel approach no higher than 54" AFF? (1998 and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: Two coat hooks are provided however both are too high; measured at 68.5" and 66" AFF. Barrier Removal: Provide an additional coat hook at accessible height. Photos: 0212 thru 0216
92	Door – Hardware Use at Den Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace hardware set. Photos: 0240
93	Storage – Reach Range of Medicine Cabinet in Den Bathroom	Where the element is accessed by forward approach over an obstruction, is the height a maximum 48" AFF when within 20" of the front of the obstruction and is knee and toe clearance provided under the obstruction to the same extent?	11B-308.2.2	1118B.5	4.2.5 & Fig. 5(b)	308.2.2	Barrier: The medicine cabinet is too high, measured at 54.75" AFF; and there is no knee and toe space provided under the counter obstruction. Barrier Removal: Lower the recessed medicine cabinet and provide knee and toe clearance at the lavatory. Photos: 0242 & 0255
94	Lavatory – Knee and Toe Clearance at Den Bathroom	Is knee and toe clearance provided so that the clear space extends at least 19" under the lavatory?	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: the lavatory is provided with a base cabinet that provides no knee and toe clearance under the lavatory. Barrier Removal: modify the base cabinet to provide knee and toe clearance. Photos: 0242 & 0252
95	Toilet – Location of flush Valve Control at Den Bathroom	Is the flush valve located on the wide side of the toilet area?	11B-604.6	1502.0	4.16.5	604.6	Barrier: The flush valve is located at the wall side of the toilet area rather than the wide side. Barrier Removal: Replace flush tank with one with the flush valve handle located at the wide side. Photos: 0239 & 0247
96	Toilet – Toilet Paper Dispenser Location at Den Bathroom	Is the centerline of the toilet paper dispenser located 7" to 9" from the front of the toilet to the centerline of the dispenser? (current standards) located within 12" from the front of the toilet? (1998 CBC) or the entire dispenser within 36" of the rear wall? (ADAAG).	11B-604.7.1	1115B.9.3 & Fig. 85	4.16.6 & Fig. 29(b)	604.7.1	Barrier: The location of this dispenser does not conform to any standard: The centerline of the dispenser is not 7" to 9" in front of the front of the toilet, nor within 12" of the front of the toilet, nor within 36" of the back wall. It is located more than 36" from the rear wall and 13.5" in front of the toilet. Barrier Removal: Relocate the surface mounted toilet paper dispenser Photos: 0239 & 0249

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15302 Brookhurst St., Westminster, CA 92683

Access Compliance Evaluation Survey Barrier Report

Survey Date: June 19, 2019 / Report Date: August 5, 2021

Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
97	Grab Bar – Obstructed Above/Below at Den Bathroom	Is the area minimum 12" above the grab bar and minimum 1.5" below and at sides of the grab bar clear of projecting elements?	11 B-609.3	1133B.4.2.5 ,1133B.5.5.1 & Fig. 11B-36	4.26.2	609.3	Barrier: The area below the rear grab bar is not clear; it is located so that there is a ½" space between the bottom of the bar and the top of the toilet tank, rather than 1.5" minimum. Barrier Removal: Relocate the grab bar. Photos: 0239 & 0251
98	Shower – Threshold at Den Bathroom	Is the entrance to the shower free of a raised threshold or curb? (ADAAG) or is the threshold a maximum of ½" and beveled 1:1? (1998 CBC)	11B-608.7	1115B.6.2.2	4.21.7	608.7	Barrier: the shower threshold is 0.875" high when compressed under load. Barrier Removal: remove threshold Photos: 0222 & 0223
99	Shower – Floor Level at Den Bathroom	Is the shower floor surface sloped a maximum of 1:48 (2.1%) and drains flush with the surface? (1998 CBC and ADAAG)	11B-609.9	1115B.6.2.4 .4	4.37	309	Barrier: the drain is depressed ½" below the level of the adjacent shower floor. Barrier Removal: provide a spacer to raise the drain cover to be flush with the shower floor. Photos: 0220 & 0221
100	Door – Hardware Use at Bedroom Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: Replace door hardware. Photos: 0300
101	Coat Hook Height at Bedroom Bathroom	Is the element accessed by forward approach no higher than 48" AFF?	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: The coat hook is located higher than 48" AFF; measured at 59.75" AFF. Barrier Removal: Provide additional coat hook at accessible height. Photos: 0303 & 0304
102	Storage – Reach Range of Medicine Cabinet in Bedroom Bathroom	Where the element is accessed by forward approach over an obstruction, is the height a maximum 48" AFF when within 20" of the front of the obstruction and is knee and toe clearance provided under the obstruction to the same extent?	11B-308.2.2	1118B.5	4.2.5 & Fig. 5(b)	308.2.2	Barrier: The medicine cabinet is too high, measured at 54." AFF; and there is no knee and toe space provided under the counter obstruction. Barrier Removal: relocate medicine cabinet and provide required knee and toe clearance. Photos: 0242 & 0255
103	Lavatory – Knee and Toe Clearance at Bedroom Bathroom	Is knee and toe clearance provided so that the clear space extends at least 19" under the lavatory?.	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: the lavatory is provided with a base cabinet that provides no knee and toe clearance under the lavatory. Barrier Removal: provide required knee and toe clearance. Photos: 0294 & 0295
104	Toilet – Clearance at Side at Bedroom	Is the distance from the side wall to the nearest obstruction minimum 48" to the wall and 36" to lavatory? (ADAAG) or minimum 28" between the toilet and lavatory? (1998 CBC).	11B-604.3.1	1115B.7.	4.16.2 &	604.3.1	Barrier: the distance from the wall to the lavatory counter is less than 60. The distance between the toilet and the lavatory counter is less than 28". Barrier removal: reconfigure to provide the required space. Photos: 0296
105	Shower – Threshold at Bedroom Bathroom	Is the entrance to the shower free of a raised threshold or curb? (ADAAG) or a threshold that is maximum ½" and beveled 1:1? (1998 CBC)	11B-608.7	1115B.6.2.2	4.21.7	608.7	Barrier: the shower threshold is 0.875" high when compressed under load. Barrier Removal: remove. Photos: 0296
106	Shower – Floor Level at Bedroom Bathroom	Is the shower floor surface sloped a maximum of 1:48 (2.1%) and drains flush with the surface? (1998 CBC and ADAAG)	11B-609.9	1115B.6.2.4 .4	4.37	309	Barrier: the drain is depressed ½" below the level of the adjacent shower floor. Barrier Removal: Aspect may remain if barriers in the Den Bathroom are remediated. Photos: 0296

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Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
107	Controls - Height of Blinds Control at Living Room Balcony Door	Is the control accessed by a parallel approach no higher than 54" AFF? (1998 CBC and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window covering control is located higher than 54" AFF; measured at 64.25" AFF. Barrier Removal: provide longer wand(s) to extend down to within 48" of the floor level per current standards. Photos: 0258 & 0259
108	Door – Threshold Height at Bedroom Sliding Patio/Balcony Door	Is the threshold no more than ½" higher than the floor level at either side? (1998 CBC), ¾" at exterior sliding doors? (ADAAG).	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: The sliding door threshold track is higher than ¾", measured at 2.125" comprising vertical edges at each side. Barrier Removal: remove threshold . Photos: 0270, 0271 & 0273 thru 0276
109	Door – Opening Force at Bedroom Sliding Patio/Balcony Door	Is the force required to operate the sliding door no more than 5 lbs.?	11B-404.2.9.33 & 11B-108	1133B.2.5.1 & 1101B.3.1 & 2	4.13.11 & 28 CFR §36.211	404.2.9.9 & 28 CFR §36.211	Barrier: The force required to operate the door exceeds 5 lbs., measured at 11 lbs. in order to open the door to 21" clear, then 30 lbs. to fully open the door, apparently due to a damaged bottom track. Barrier Removal: Replace or repair door to bring within maximum opening pressure. Photos: 0264, 0265 & 0267

Room 304 – Vacant One Bedroom

Designated as Unit-C on building plans at 629 SF, including one large bedroom with a window and a bathroom with roll-in shower, a living room and wet bar with window and access to the balcony.

110	Door – Hardware Use at Unit Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the deadbolt lock requires pinching and twisting of the wrist to operate. Barrier Removal: provide an additional deadbolt with accessible handle. Photos: 0307 & 0308
111	Door – Peephole Height at Unit Entrance	Are door vision panels no higher than 43" AFF?	11B-404.2.11	N/A	28 CFR § 36.202	404.2.11	Barrier: The peephole is located too high to be usable by a person in a wheelchair or of low stature, measured at 60" AFF. Barrier Removal: add an additional peephole below the existing peephole. Photos: 0307 & 0309
112	Controls – Height of Thermostat control	Is the control accessed by parallel approach no higher than 48" AFF? (pertinent to current CBC and ADA standards) no higher than 54" AFF? (pertinent to 1998 CBC and ADAAG)	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: The thermostat is located such that the control is higher than 48" AFF; measured at 49.5" AFF. Note: The thermostat appears to have been provided after initial construction and subject to later applicable standards. Barrier Removal: relocate surface mounted thermostat. Photos: 0358
113	Door – Clear Width at living Room Sliding Balcony Door	Is the minimum clear width at the sliding door 32" minimum?	11B-404.2.3	1133B.2.2	4.13.5	404.2.3	Barrier: The clear width is less than 32", measured at 30.75" because a bumper prevents the door from opening fully. Barrier Removal: modify or replace bumper so that the door can open to the extent that it provides minimum 32" clear. Photos: 0318
114	Door – Threshold Height at Living Room Sliding Patio/Balcony Door	Is the threshold no more than ½" higher than the floor level at either side? (1998 CBC and) ¾" at exterior sliding doors? ADAAG).	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: The sliding door threshold track is higher than ¾", measured at 2.125" comprising vertical edges at each side. Barrier Removal: Remove and replace the sliding door and frame with one with a semi recessed bottom track, or alternately, replace the sliding door with a pair of swinging doors with a standard threshold. Photos: 0319 & 0320

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Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
115	Controls - Height of Window latch at Living Room Window	Is the control accessed by a parallel approach no higher than 48" AFF? (current standards) 54" AFF? (1998 CBC and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window covering control is located higher than 54" AFF; measured at 69" AFF. Barrier Removal: relocate window hardware to height required by current standards. Photos: 0322 & 0324
116	Door – Hardware Use at Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace hardware set. Photos: 0335
117	Coat Hook Height at Bathroom	Is the element accessed by forward approach no higher than 48" AFF?	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: The coat hook is located higher than 48" AFF; measured at 60" AFF. Barrier Removal: Relocate coat hook or provide a second lower coat hook. Photos: 0328, 0335 & 0336
118	Storage – Reach Range of Medicine Cabinet in Den Bathroom	Where the element is accessed by forward approach over an obstruction, is the height a maximum 48" AFF when within 20" of the front of the obstruction and is knee and toe clearance provided under the obstruction to the same extent?	11B-308.2.2	1118B.5	4.2.5 & Fig. 5(b)	308.2.2	Barrier: The medicine cabinet is too high, measured at 54" AFF; and there is no knee and toe space provided under the counter obstruction. Barrier Removal: Lower the recessed medicine cabinet and provide knee and toe clearance at the lavatory. Photos: 0331
119	Lavatory – Knee and Toe Clearance at Den Bathroom	Is knee and toe clearance provided so that the clear space extends at least 19" under the lavatory?	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: the lavatory is provided with a base cabinet that provides no knee and toe clearance under the lavatory. Barrier Removal: modify the base cabinet to provide knee and toe clearance. Photos: 0350
120	Toilet – Clearance at Side at Den Bathroom	Is the distance from the side wall to the nearest obstruction minimum 60"? (current standards) minimum 48" to the wall and 36" to lavatory? (ADAAG) minimum 28" between the toilet and lavatory? (1998 CBC).	11B-604.3.1	1115B.7.	4.16.2 & Fig. 28	604.3.1	Barrier: the distance from the wall to the lavatory counter is less than 60", measured at 50.5" to the lavatory counter and 48.25" to the towel bar. There is less than 28" provided between the toilet and the lavatory, measured at 23" to counter and 20.75" to towel bar. Barrier Removal: Modify the lavatory counter in order to provide more clearance. Remove the towel bar. Photos: 0344 thru 0346
121	Toilet – Location of flush Valve Control at Den Bathroom	Is the flush valve located on the wide side of the toilet area?	11B-604.6	1502.0	4.16.5	604.6	Barrier: The flush valve is located at the wall side of the toilet area rather than the wide side. Barrier Removal: Replace flush tank with one with the flush valve handle located at the wide side. Photos: 0330 & 0339
122	Toilet – Toilet Paper Dispenser Location at Den Bathroom	Is the centerline of the toilet paper dispenser located 7" to 9" from the front of the toilet to the centerline of the dispenser? (current standards) located within 12" from the front of the toilet? (1998 CBC) entire dispenser within 36" of the rear wall? (the ADAAG).	11B-604.7.1	1115B.9.3 & Fig. 85	4.16.6 & Fig. 29(b)	604.7.1	Barrier: The location of this dispenser does not conform to any standard: The centerline of the dispenser is not 7" to 9" in front of the front of the toilet, nor within 12" of the front of the toilet, nor within 36" of the back wall. It is located more than 36" from the rear wall and 13.25" in front of the toilet. Barrier Removal: Relocate the surface mounted toilet paper dispenser Photos: 0330 & 0340

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123	Grab Bar – Obstructed Above/Below at Den Bathroom	Is the area minimum 12" above the grab bar and minimum 1.5" below and at sides of the grab bar clear of projecting elements?	11 B-609.3	1133B.4.2.5, 1133B.5.5.1 & Fig. 11B-36	4.26.2	609.3	Barrier: The area below the rear grab bar is not clear; it is located so that there is almost no clearance between the bottom of the bar and the top of the toilet tank, rather than 1.5" minimum. Barrier Removal: Relocate the grab bar. Photos: 0330, 0331 & 0343
124	Shower – Threshold at Den Bathroom	Is the entrance to the shower free of a raised threshold or curb? (ADAAG) threshold that is ½" maximum and beveled 1:1? (1998 CBC) threshold that is ½" maximum with the portion between ¼" high and ½" high sloping at 1:2? (current standards).	11B-608.7	1115B.6.2.2	4.21.7	608.7	Barrier: the shower threshold is 0.875" high when compressed under load. Barrier Removal: remove threshold Photos: 0333
125	Shower – Floor Level at Den Bathroom	Is the shower floor surface sloped a maximum of 1:48 (2.1%) and drains flush with the surface? (1998 CBC and ADAAG)	11B-609.9	1115B.6.2.4 .4	4.37	309	Barrier: the drain is depressed ½" below the level of the adjacent shower floor. Barrier Removal: provide a spacer to raise the drain cover to be flush with the shower floor. Photos: 0332 & 0333
126	Door – Hardware Use at Bedroom Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force? Note: one of two bathrooms provided where only one accessible bathroom is required.	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: Aspect may remain if barriers in the Den Bathroom are remediated. Photos: 0355 & 0356

Room 315 – Vacant One Bedroom

Designated as Unit-D on building plans at 658 SF, including one large bedroom with a window and bathroom with roll-in shower, and a living room and wet bar with access to the balcony.

127	Door – Hardware Use at Unit Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the deadbolt lock requires pinching and twisting of the wrist to operate. Barrier Removal: provide an additional deadbolt with accessible handle. Photos: 0361 & 0362
128	Door – Peephole Height at Unit Entrance	Are door vision panels no higher than 43" AFF?	11B-404.2.11	N/A	28 CFR § 36.202	404.2.11	Barrier: The peephole is located too high to be usable by a person in a wheelchair or of low stature, measured at 59.75" AFF. Barrier Removal: add an additional peephole below the existing peephole. Photos: 0362 & 0363
129	Door – Clear Width at living Room Sliding Balcony Door	Is the minimum clear width at the sliding door 32" minimum?	11B-404.2.3	1133B.2.2	4.13.5	404.2.3	Barrier: The clear width is less than 32", measured at 30" because a bumper prevents the door from opening fully. Barrier Removal: modify or replace bumper so that the door can open to the extent that it provides minimum 32" clear. Photos: 0369
130	Door – Threshold Height at Living Room Sliding Patio/Balcony Door	Is the threshold no more than ½" higher than the floor level at either side? (1998 CBC) ¾" at exterior sliding doors? (ADAAG).	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: The sliding door threshold track is higher than ¾", measured at 2.75" comprising vertical edges at each side. Barrier Removal: Remove and replace the sliding door and frame with one with a semi recessed bottom track, or alternately, replace the sliding door with a pair of swinging doors with a standard threshold. Photos: 0372 thru 0374

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Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
131	Door – Hardware Use at Bedroom Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace lockset. Photos: 0375 & 0376
132	Controls - Height of Blinds Control at Bedroom Window	Is the control accessed by a parallel approach no higher than 48" AFF? (current standards) 54" AFF? (1998 CBC and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window latch is located higher than 48" AFF; measured at 69" AFF. Barrier Removal: relocate the latch. Photos: 0380 & 0381
133	Door – Hardware Use at Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace hardware set. Photos: 0382 & 0389
134	Coat Hook Height at Bathroom	Is the element accessed by forward approach no higher than 48" AFF?	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: The coat hook is located higher than 48" AFF; measured at 59.75" AFF. Barrier Removal: Relocate coat hook or provide a second lower coat hook. Photos: 0382 & 0390
135	Storage – Reach Range of Medicine Cabinet in Bathroom	Where the element is accessed by forward approach over an obstruction, is the height a maximum 48" AFF when within 20" of the front of the obstruction and is knee and toe clearance provided under the obstruction to the same extent?	11B-308.2.2	1118B.5	4.2.5 & Fig. 5(b)	308.2.2	Barrier: The medicine cabinet is too high, measured at 54" AFF; and there is no knee and toe space provided under the counter obstruction. Barrier Removal: Lower the recessed medicine cabinet and provide knee and toe clearance at the lavatory. Photos: 0398
136	Lavatory – Knee and Toe Clearance at Bathroom	Is knee and toe clearance provided so that the clear space extends at least 19" under the lavatory?	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: the lavatory is provided with a base cabinet that provides no knee and toe clearance under the lavatory. Barrier Removal: modify the base cabinet to provide knee and toe clearance. Photos: 0385, 0387 & 0388
137	Toilet – Clearance at Side at Bathroom	Is the distance from the side wall to the nearest obstruction minimum 60"? (current standards) minimum 48" to the wall and 36" to lavatory? (ADAAG) minimum 28" between the toilet and lavatory? (the 1998 CBC).	11B-604.3.1	1115B.7.2	4.16.2 & Fig. 28	604.3.1	Barrier: the distance from the wall to the lavatory counter is less than 60", measured at 50.5". Note: the distance between the toilet and the lavatory counter is less than 28", measured at 23.5" to the lavatory counter. Barrier Removal: Modify the lavatory counter in order to provide more clearance. Photos: 0386, 0394 & 0396
138	Toilet – Height of Seat at Bathroom	Is the toilet seat 17" to 19" AFF?	11B-604.4	1502.0	4.16.3	604.4	Barrier: the toilet seat is lower than 17", measured at 15.25" AFF. Barrier Removal: replace toilet. Photos: 0386 & 0392
139	Grab Bar – Location of Side Bar	Does the side grab bar extend a minimum of 54" from the rear wall? (current CBC and ADA and ADAAG) extend a minimum of 24" in front of the toilet? (1998 and 2019 CBC). Does the side grab bar begin a maximum of 12" from the rear wall?	11B-604.5.1	1115B.8.1	4.17.6 & Fig. 29 & 30	604.5.1	Barrier: The Side grab bar begins farther than 12" from the rear wall, measured at 13.75". Barrier Removal: Relocate the grab bar. Photos: 0386 & 0394
140	Shower – Threshold at Den Bathroom	Is the entrance to the shower free of a raised threshold or curb? (ADAAG) threshold that is 1/2" maximum and beveled 1:1? (1998 CBC)	11B-608.7	1115B.6.2.2	4.21.7	608.7	Barrier: the shower threshold is 0.875" high when compressed under load. Barrier Removal: remove threshold Photos: 0402

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141	Shower – Handheld Sprayer Mount Height at Den Bathroom	Is a handheld spray unit provided mounted at a maximum height of 48" above the shower floor?	11B-308.2.1	1115B.6.2.4 .2	4.2.5 & 6	308.2.1	Barrier: the non-adjustable mounting hook is located 69" above the shower floor level. Barrier Removal: Provide a lower hook. Photos: 0399 & 0400

Room 325 – Vacant Studio

Designated as Unit-B on building plans at 530 SF, including a bathroom with roll-in shower, a wet bar, a living room area with access to the balcony and a bedroom area with window.

142	Door – Hardware Use at Unit Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the deadbolt lock requires pinching and twisting of the wrist to operate. Barrier Removal: provide an additional deadbolt with accessible handle. Photos: 409 & 0412
143	Door – Peephole Height at Unit Entrance	Are door vision panels no higher than 43" AFF?	11B-404.2.11	N/A	28 CFR § 36.202	404.2.11	Barrier: The peephole is located too high to be usable by a person in a wheelchair or of low stature, measured at 60" AFF. Barrier Removal: add an additional peephole below the existing peephole. Photos: 0412 & 0413
144	Door – Clear Width at living Room Sliding Balcony Door	Is the minimum clear width at the sliding door 32" minimum?	11B-404.2.3	1133B.2.2	4.13.5	404.2.3	Barrier: The clear width is less than 32", measured at 29.5" because a bumper prevents the door from opening fully. Barrier Removal: modify or replace bumper so that the door can open to the extent that it provides minimum 32" clear. Photos: 0438 & 0439
145	Door – Threshold Height at Living Room Sliding Patio/Balcony Door	Is the threshold no more than ½" higher than the floor level at either side? (1998 CBC), ¾" at exterior sliding doors? (ADAAG).	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: The sliding door threshold track is higher than ¾", it is 2.175" high comprising vertical edges at each side. Barrier Removal: Remove and replace the sliding door and frame with one with a semi recessed bottom track, or alternately, replace the sliding door with a pair of swinging doors with a standard threshold. Photos: 0439
146	Controls - Height of Blinds Control at Living Room Balcony Door	Is the control accessed by a parallel approach no higher than 48" AFF? (current standards) 54" AFF? (1998 and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window covering control is located higher than 454" AFF; it is 60" AFF. Barrier Removal: provide longer wand(s) to extend down to within 48" of the floor level. Photos: 0441
147	Controls - Height of Latch at Bedroom Window	Is the control accessed by a parallel approach no higher than 48" AFF? (current standards) 54" AFF? (1998 and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window covering control is located higher than 54" AFF; it is 60" AFF. Barrier Removal: Relocate the latch. Photos: 0436 & 0437
148	Door – Hardware Use at Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace hardware set. Photos: 0414 & 0415
149	Coat Hook Height at Bathroom	Is the element accessed by forward approach no higher than 48" AFF?	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: The coat hook is located higher than 48" AFF; it is 60" AFF. Barrier Removal: Relocate coat hook or provide a second lower coat hook. Photos: 0415

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150	Storage – Reach Range of Medicine Cabinet in Bathroom	Where the element is accessed by forward approach over an obstruction, is the height a maximum 48" AFF when within 20" of the front of the obstruction and is knee and toe clearance provided under the obstruction to the same extent?	11B-308.2.2	1118B.5	4.2.5 & Fig. 5(b)	308.2.2	Barrier: The medicine cabinet is too high, it is 54" AFF; and there is no knee and toe space provided under the counter obstruction. Barrier Removal: Lower the recessed medicine cabinet and provide knee and toe clearance at the lavatory. Photos: 0458
151	Lavatory – Knee and Toe Clearance at Bathroom	Is knee and toe clearance provided so that the clear space extends at least 19" under the lavatory?	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: the lavatory is provided with a base cabinet that provides no knee and toe clearance under the lavatory. Barrier Removal: modify the base cabinet to provide knee and toe clearance. Photos: 0417 & 0418
152	Toilet – Clearance at Side at Den Bathroom	Is the distance from the side wall to the nearest obstruction minimum 60"? (current standards) minimum 48" to the wall and 36" to lavatory? (ADAAG) minimum 28" between the toilet and lavatory? (the 1998 CBC). Note: one of two bathrooms provided where only one accessible bathroom is required.	11B-604.3.1	1115B.7.2 – see note at right	4.16.2 & Fig. 28 – see note at right	604.3.1	Barrier: the distance from the wall to the lavatory counter is less than 60", measured at 51.5". Note: the distance between the toilet and the lavatory counter is less than 28", measured at 24" to the lavatory counter. Barrier Removal: Modify the lavatory counter in order to provide more clearance. Photos: 0421, 0428, 0429 & 0430
153	Grab Bar – Obstructed Above/Below at Den Bathroom	Is the area minimum 12" above the grab bar and minimum 1.5" below and at sides of the grab bar clear of projecting elements?	11 B-609.3	1133B.4.2.5 ,1133B.5.5. 1 & Fig. 11B-36	4.26.2	609.3	Barrier: The area below the rear grab bar is not clear; it is located so that there is no space between the bottom of the bar and the top of the toilet tank, rather than 1.5" minimum. Barrier Removal: Relocate the grab bar. Photos: 0421 & 0435
154	Grab Bar – Location of Side Bar	Does the side grab bar extend a minimum of 54" from the rear wall? (current CBC and ADA and ADAAG) extend a minimum of 24" in front of the toilet? (1998 and 2019 CBC). Does the side grab bar begin a maximum of 12" from the rear wall?	11B-604.5.1	1115B.8.1	4.17.6 & Fig. 29 & 30	604.5.1	Barrier: The Side grab bar does not begin within 12" of the rear wall, measured at beginning 13.5" from the rear wall. Barrier Removal: Relocate the grab bar. Photos: 0421 & 0434
155	Shower – Threshold at Bathroom	Is the entrance to the shower free of a raised threshold or curb? (ADAAG) threshold that is ½" maximum and beveled 1:1? (1998 CBC)).	11B-608.7	1115B.6.2.2	4.21.7	608.7	Barrier: the shower threshold is 0.875" high when compressed under load. Barrier Removal: remove threshold Photos: 0422
156	Shower – Floor Level at Bathroom	Is the shower floor surface sloped a maximum of 1:48 (2.1%) and drains flush with the surface? (1998 and 2019 CBC and ADAAG) conforming to level change requirements for an accessible route? (2010 ADA).	11B-609.9	1115B.6.2.4 .4	4.37	309	Barrier: the drain is depressed ½" below the level of the adjacent shower floor. Barrier Removal: provide a spacer to raise the drain cover to be flush with the shower floor. Photos: 0422
157	Shower – Handheld Sprayer Mount Height at Bathroom	Is a handheld spray unit provided mounted at a maximum height of 48" above the shower floor?	11B-308.2.1	1115B.6.2.4 .2	4.2.5 & 6	308.2.1	Barrier: the non-adjustable handheld shower mount is higher than 48" above the floor surface of the shower, measured at 51.5" above the floor. Barrier Removal: provide a lower mounting bracket. Photos: 0432 & 0431

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Survey Date: June 19, 2019 / Report Date: August 5, 2021

Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
Room 317 – Vacant Studio (Sales Model) Designated as Unit-B on building plans at 530 SF, including a bathroom with roll-in shower, a wet bar, a living room area with access to the balcony and a bedroom area with window.							
158	Door – Hardware Use at Unit Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the deadbolt lock requires pinching and twisting of the wrist to operate. Barrier Removal: provide an additional deadbolt with accessible handle. Photos: 0452
159	Door – Peephole Height at Unit Entrance	Are door vision panels no higher than 43" AFF?	11B-404.2.11	N/A	28 CFR § 36.202	404.2.11	Barrier: The peephole is located too high to be usable by a person in a wheelchair or of low stature, it is 60" AFF. Barrier Removal: add an additional peephole below the existing peephole. Photos: 0443
160	Door Threshold – Height at Unit Entrance	Is the threshold height above the floor level at either side of the door no higher than ½", or ¾" specifically for exterior sliding doors?	404.2.5 & 11B-108	1133BV.2.4 .1& 1101B.3.1 & 2	4.13.8 & 28 CFR §36.211	404.2.5 & 28 CFR §36.211	Barrier: the screws holding down the threshold are loose and projecting above the top of the threshold. Barrier Removal: tighten or repair threshold fasteners. Photos: 0447
161	Door – Clear Width at living Room Sliding Balcony Door	Is the minimum clear width at the sliding door 32" minimum?	11B-404.2.3	1133B.2.2	4.13.5	404.2.3	Barrier: The clear width is less than 32", measured at 31.75" because a bumper prevents the door from opening fully. Barrier Removal: modify or replace bumper so that the door can open to the extent that it provides minimum 32" clear. Photos: 0485
162	Door – Threshold Height at Living Room Sliding Patio/Balcony Door	Is the threshold no more than ½" higher than the floor level at either side? (1998 CBC), ¾" at exterior sliding doors? (ADAAG).	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: The sliding door threshold track is higher than ¾", it is 2." comprising vertical edges at each side. Barrier Removal: Remove and replace the sliding door and frame with one with a semi recessed bottom track, or alternately, replace the sliding door with a pair of swinging doors with a standard threshold. Photos: 0487
163	Controls - Height of Latch at Bedroom Window	Is the control accessed by a parallel approach no higher than 48" AFF? (current standards) 54" AFF? (1998 CBC and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window covering control is located higher than 54" AFF; located at 60" AFF. Barrier Removal: Relocate the latch. Photos: 0481 & 0482
164	Door – Hardware Use at Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace hardware set. Photos: 0455 & 0471
165	Coat Hook Height at Bathroom	Is the element accessed by forward approach no higher than 48" AFF?	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: The coat hook is located higher than 48" AFF; it is 60" AFF. Barrier Removal: Relocate coat hook or provide a second lower coat hook. Photos: 0456
166	Storage – Reach Range of Medicine Cabinet in Bathroom	Where the element is accessed by forward approach over an obstruction, is the height a maximum 48" AFF when within 20" of the front of the obstruction and is knee and toe clearance provided under the obstruction to the same extent?	11B-308.2.2	1118B.5	4.2.5 & Fig. 5(b)	308.2.2	Barrier: The medicine cabinet is too high, it is 54" AFF; and there is no knee and toe space provided under the counter obstruction. Barrier Removal: Lower the recessed medicine cabinet and provide knee and toe clearance at the lavatory. Photos: 0458 & 0460

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Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
167	Lavatory – Knee and Toe Clearance at Bathroom	Is knee and toe clearance provided so that the clear space extends at least 19" under the lavatory?	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: the lavatory is provided with a base cabinet that provides no knee and toe clearance under the lavatory. Barrier Removal: modify the base cabinet to provide knee and toe clearance. Photos: 0458 & 0459
168	Toilet – Clearance at Side at Den Bathroom	Is the distance from the side wall to the nearest obstruction minimum 60"? (current standards) minimum 48" to the wall and 36" to lavatory? (ADAAG) minimum 28" between the toilet and lavatory? (the 1998 CBC). Note: one of two bathrooms provided where only one accessible bathroom is required.	11B-604.3.1	1115B.7.2	4.16.2 & Fig. 28	604.3.1	Barrier: the distance from the wall to the lavatory counter is less than 60", measured at 51.5". Note: the distance between the toilet and the lavatory counter is less than 28", measured at 22.75" to the lavatory counter. Barrier Removal: Modify the lavatory counter in order to provide more clearance. Photos: 0466, 0471, 0472 & 0474
169	Grab Bar – Location of Side Bar at Bathroom	Does the side grab bar extend a minimum of 54" from the rear wall? (ADAAG) and a minimum of 24" in front of the toilet? (1998 CBC). Does the side grab bar begin a maximum of 12" from the rear wall?	11B-604.5.1	1115B.8.1	4.17.6 & Fig. 29 & 30	604.5.1	Barrier: The Side grab bar does not begin within 12" of the rear wall, measured beginning 14' from the rear wall. Barrier Removal: Relocate the grab bar to conform to current CBC and ADA standards. Photos: 0457, 0469 & 0470
170	Shower – Threshold at Bathroom	Is the entrance to the shower free of a raised threshold or curb? (ADAAG) or a threshold that is ½" maximum and beveled 1:1? (1998 CBC)	11B-608.7	1115B.6.2.2	4.21.7	608.7	Barrier: the shower threshold is 0.75" high when compressed under load. Barrier Removal: remove threshold Photos: 0475 & 0476
171	Shower – Handheld Sprayer Mount Height at Bathroom	Is a handheld spray unit provided mounted at a maximum height of 48" above the shower floor?	11B-308.2.1	1115B.6.2.4 .2	4.2.5 & 6	308.2.1	Barrier: the stationary handheld sprayer mount is higher than 48", measured at 69" above the shower floor. Barrier Removal: provide a mount at a lower location. Photos: 0461, 0479 & 0480

Room 336 – Vacant One Bedroom

Designated as Unit-A on building plans at 496 SF, including a bathroom with roll-in shower, a wet bar, a living room area with access to the balcony and a bedroom area with window.

172	Door – Hardware Use at Unit Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the deadbolt lock requires pinching and twisting of the wrist to operate. Barrier Removal: provide an additional deadbolt with accessible handle. Photos: 0495 & 0496
173	Door – Peephole Height at Unit Entrance	Are door vision panels no higher than 43" AFF?	11B-404.2.11	N/A	28 CFR § 36.202	404.2.11	Barrier: The peephole is located too high to be usable by a person in a wheelchair or of low stature, it is 59" AFF. Barrier Removal: add an additional peephole below the existing peephole. Photos: 0496
174	Door – Threshold Height at Living Room Sliding Patio/Balcony Door	Is the threshold no more than ½" higher than the floor level at either side? (1998), ¾" at exterior sliding doors? (ADAAG).	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: The sliding door threshold track is higher than ¾", it is 2" high comprising vertical edges at each side. Barrier Removal: Remove and replace the sliding door and frame with one with a semi recessed bottom track, or alternately, replace the sliding door with a pair of swinging doors with a standard threshold. Photos: 0501

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Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
175	Door – Hardware Use at Bedroom Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace lockset. Photos: 0504
176	Controls - Height of Blinds Control at Bedroom Window	Is the control accessed by a parallel approach no higher than 54" AFF? (1998 CBC and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window covering control is located higher than 54" AFF it is 60" AFF. Barrier Removal: provide longer wand(s) to extend down to within 48" of the floor level. Photos: 0507
177	Controls – Use of Bedroom Window Opening Hardware	Is the window hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.27.4	309.4	Barrier: the window lock requires pinching and twisting of the wrist to operate. Barrier Removal: provide accessible lock. Photos: 0507 thru 0509
178	Controls – Use of Bedroom Window Opening Hardware	Is the window hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4 & 11B-108	1117B.6.4 & 1101B.3.1 & 2	4.27.4 & 28 CFR §36.211	309.4 & 28 CFR §36.211	Barrier: the window requires 20 lbs. force to open. Barrier Removal: conduct maintenance on window sliding components. Photos: 0507 thru 0509 & 0519
179	Door – Hardware Use at Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace hardware set. Photos: 0510 & 0511
180	Coat Hook Height at Bathroom	Is the element accessed by forward approach no higher than 48" AFF?	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: The coat hook is located higher than 48" AFF; it is 60" AFF. Barrier Removal: Relocate coat hook or provide a second lower coat hook. Photos: 0511
181	Storage – Reach Range of Medicine Cabinet at Bathroom	Where the element is accessed by forward approach over an obstruction, is the height a maximum 48" AFF when within 20" of the front of the obstruction and is knee and toe clearance provided under the obstruction to the same extent?	11B-308.2.2	1118B.5	4.2.5 & Fig. 5(b)	308.2.2	Barrier: The medicine cabinet is too high, measured at 49.75" AFF; and there is no knee and toe space provided under the counter obstruction. Barrier Removal: Lower the recessed medicine cabinet and provide knee and toe clearance at the lavatory. Photos: 0515 & 0518
182	Lavatory – Knee and Toe Clearance at Bathroom	Is knee and toe clearance provided so that the clear space extends at least 19" under the lavatory?	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: the lavatory is provided with a base cabinet that provides no knee and toe clearance under the lavatory. Barrier Removal: modify the base cabinet to provide knee and toe clearance. Photos: 0514
183	Toilet – Clearance at Side at Bathroom	Is the distance from the side wall to the nearest obstruction minimum 60"? (current standards) minimum 48" to the wall and 36" to lavatory? (ADAAG) minimum 28" between the toilet and lavatory? (the 1998 CBC).	11B-604.3.1	1115B.7.2	4.16.2 & Fig. 28	604.3.1	Barrier: the distance from the wall to the lavatory counter is less than 60", measured at 51". The distance between the toilet and the lavatory counter is less than 28", measured at 21.5" to the lavatory counter. Barrier Removal: Modify the lavatory counter in order to provide more clearance. Photos: 0529, 0530 & 0518
184	Grab Bar – Obstructed Above/Below at Bathroom	Is the area minimum 12" above the grab bar and minimum 1.5" below and at sides of the grab bar clear of projecting elements?	11 B-609.3	1133B.4.2.5 ,1133B.5.5. 1 & Fig. 11B-36	4.26.2	609.3	Barrier: The area above the rear grab bar is obstructed by a wall-mounted cabinet located 10.25" above the top of the bar. minimum. Barrier Removal: Remove the cabinet. Photos: 0522 & 0523

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Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
185	Grab Bar – Location of Side Bar	Does the side grab bar extend a minimum of 54" from the rear wall? (current CBC and ADA and ADAAG) extend a minimum of 24" in front of the toilet? (1998 and 2019 CBC). Does the side grab bar begin a maximum of 12" from the rear wall?	11B-604.5.1	1115B.8.1	4.17.6 & Fig. 29 & 30	604.5.1	Barrier: The Side grab bar does not begin within 12" of the rear wall, measured at beginning 14.5" from the rear wall. Barrier Removal: Relocate the grab bar. Photos: 0525
186	Shower – Threshold at Bathroom	Is the entrance to the shower free of a raised threshold or curb? (ADAAG) or a threshold that is ½" maximum and beveled 1:1? (1998 CBC)	11B-608.7	1115B.6.2.2	4.21.7	608.7	Barrier: the shower threshold is 0.875" high when compressed under load. Barrier Removal: remove threshold Photos: 0533
187	Shower – Floor Level at Bathroom	Is the shower floor surface sloped a maximum of 1:48 (2.1%) and drains flush with the surface? (1998 and 2019 CBC and ADAAG) conforming to level change requirements for an accessible route? (2010 ADA).	11B-609.9	1115B.6.2.4 .4	4.37	309	Barrier: the drain is depressed ½" below the level of the adjacent shower floor. Barrier Removal: provide a spacer to raise the drain cover to be flush with the shower floor. Photos: 0533
188	Shower – Seat Clearance to Wall at Den Bathroom	Is the seat located so that in the deployed position the rear edge is within 2.5" of the wall and the side edge within 1.5" of the wall?	11B-610.3.1	1115B.6.2.4 .5	4.21.3	610.3.1	Barrier: the seat is located so that there is a 2" gap between the edge of the seat and the side wall, rather than 1.5" maximum. Barrier Removal: Adjust position of seat on folding support. folding seat Photos: 0518
189	Shower – Handheld Sprayer Mount Height at Den Bathroom	Is a handheld spray unit provided mounted at a maximum height of 48" above the shower floor? Note: one of two bathrooms provided where only one accessible bathroom is required.	11B-308.2.1	1115B.6.2.4 .2	4.2.5 & 6	308.2.1	Barrier: the stationary handheld shower bracket is located 64" above the shower floor level. Barrier Removal: provide a lower bracket. Photos: 0534

Room 215 – Vacant One Bedroom

Designated as Unit-A on building plans at 496 SF, including a bathroom with roll-in shower, a wet bar, a living room area with access to the balcony and a bedroom area with window.

190	Door – Hardware Use at Unit Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the deadbolt lock requires pinching and twisting of the wrist to operate. Barrier Removal: provide an additional deadbolt with accessible handle. Photos: 0562 & 0563
191	Door – Peephole Height at Unit Entrance	Are door vision panels no higher than 43" AFF?	11B-404.2.11	N/A	28 CFR § 36.202	404.2.11	Barrier: The peephole is located too high to be usable by a person in a wheelchair or of low stature, measured at 59" AFF. Barrier Removal: add an additional peephole below the existing peephole. Photos: 0563
192	Door – Hardware Use at Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace hardware set. Photos: 0569
193	Coat Hook Height at Bathroom	Is the element accessed by forward approach no higher than 48" AFF?	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: The coat hook is located higher than 48" AFF; at 60" AFF. Barrier Removal: Relocate coat hook or provide a second lower coat hook. Photos: 0569

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Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
194	Storage – Reach Range of Medicine Cabinet in Bathroom	Where the element is accessed by forward approach over an obstruction, is the height a maximum 48" AFF when within 20" of the front of the obstruction and is knee and toe clearance provided under the obstruction to the same extent?	11B-308.2.2	1118B.5	4.2.5 & Fig. 5(b)	308.2.2	Barrier: The medicine cabinet is too high, at 55" AFF; and there is no knee and toe space provided under the counter obstruction. Barrier Removal: Lower the recessed medicine cabinet and provide knee and toe clearance at the lavatory. Photos: 0571
195	Lavatory – Knee and Toe Clearance at Bathroom	Is knee and toe clearance provided so that the clear space extends at least 19" under the lavatory?	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: the lavatory is provided with a base cabinet that provides no knee and toe clearance under the lavatory. Barrier Removal: modify the base cabinet to provide knee and toe clearance. Photos: 0571
196	Shower – Threshold at Bathroom	Is the entrance to the shower free of a raised threshold or curb? (ADAAG) or a threshold that is ½" maximum and beveled 1:1? (1998 CBC)	11B-608.7	1115B.6.2.2	4.21.7	608.7	Barrier: the shower threshold is 01.375" high (note: this is a hard threshold that does not compress). Barrier Removal: remove threshold Photos: 0574
197	Shower – Floor Level at Bathroom	Is the shower floor surface sloped a maximum of 1:48 (2.1%) and drains flush with the surface? (1998 and 2019 CBC and ADAAG) conforming to level change requirements for an accessible route? (2010 ADA).	11B-609.9	1115B.6.2.4 .4	4.37	309	Barrier: the drain is depressed ½" below the level of the adjacent shower floor. Barrier Removal: provide a spacer to raise the drain cover to be flush with the shower floor. Photos: 0570

Room 103 – Occupied One Bedroom

Designated as Unit-C on building plans at 629 SF, including a wet bar, a living room area with window and access to the patio and a bedroom area with window and a bathroom with roll-in shower. I was permitted to capture photographs in a limited manner to protect the privacy of the occupant. I found the physical conditions to be similar in this occupied unit to those of the unoccupied suites with regard to accessibility and having the same barriers

198	Door – Hardware Use at Unit Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the deadbolt lock requires pinching and twisting of the wrist to operate. Barrier Removal: provide an additional deadbolt with accessible handle. Photos: 0701 & 0703
199	Door – Peephole Height at Unit Entrance	Are door vision panels no higher than 43" AFF?	11B-404.2.11	N/A	28 CFR § 36.202	404.2.11	Barrier: The peephole is located too high to be usable by a person in a wheelchair or of low stature, measured at 59.5" AFF. Barrier Removal: add an additional peephole below the existing peephole. Photos: 0702 & 731
200	Door – Clear Width at Living Room Sliding Patio Door	Is the minimum clear width at the sliding door 32" minimum?.	11B-404.2.3	1133B.2.2	4.13.5	404.2.3	Barrier: The clear width is less than 32", measured at 30.75" because a bumper prevents the door from opening fully. Barrier Removal: modify or replace bumper so that the door can open to the extent that it provides minimum 32" clear. Photos: 0693 & 0696
201	Door – Threshold Height at Living Room Sliding Patio Door	Is the threshold no more than ½" higher than the floor level at either side? (1998), ¾" at exterior sliding doors? (ADAAG).	11B-404.2.5	1133B.2.4.1	4.13.8	404.2.5	Barrier: The sliding door threshold track is higher than ¾", measured at 1.375" comprising vertical edges at each side. Barrier Removal: Remove and replace the sliding door and frame with one with a semi recessed bottom track, or alternately, replace the sliding door with a pair of swinging doors with a standard threshold. Photos: 0693, 0695, 0697, 0698 & 0700

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Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
202	Door – Hardware Use at Bedroom Entrance	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force? Note: one of two bathrooms provided where only one accessible bathroom is required.	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace hardware set. Photos: 0709
203	Controls - Height of Blinds Control at Bedroom Window	Is the control accessed by a parallel approach no higher than 48" AFF? (current standards) 54" AFF? (1998 and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window covering control is located higher than 54" AFF; at 64" AFF. Barrier Removal: provide longer wand(s) to extend down to within 48" of the floor level. Photos: 0711
204	Controls - Height of Window Latch at Bedroom Window	Is the control accessed by a parallel approach no higher than 48" AFF? (current standards) 54" AFF? (1998 and ADAAG).	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: the window covering control is located higher than 54" AFF; at 63" AFF. Barrier Removal: provide longer wand(s) to extend down to within 48" of the floor level. Photos: 0712 & 0713
205	Door – Hardware Use at Bathroom	Is the door hardware operable without requiring tight grasping, pinching, twisting of the wrist, more than one hand or greater than 5 pounds force?	11B-309.4	1117B.6.4	4.13.9	309.4	Barrier: the lock requires pinching and twisting of the wrist to operate. Barrier Removal: replace hardware set. Photos: 0719
206	Coat Hook Height at Den Bathroom	Is the element accessed by forward approach no higher than 48" AFF?	11B-308.2.1	1118B.5 & 6	4.2.5 & 6	308.2.1	Barrier: The coat hook is located higher than 48" AFF; Measured at 60" AFF. Barrier Removal: Relocate coat hook or provide a second lower coat hook. Photos: 0719 & 0722
207	Storage – Reach Range of Medicine Cabinet in Den Bathroom	Where the element is accessed by forward approach over an obstruction, is the height a maximum 48" AFF when within 20" of the front of the obstruction and is knee and toe clearance provided under the obstruction to the same extent?	11B-308.2.2	1118B.5	4.2.5 & Fig. 5(b)	308.2.2	Barrier: The medicine cabinet is too high, at 55" AFF; and there is no knee and toe space provided under the counter obstruction. Barrier Removal: Lower the recessed medicine cabinet and provide knee and toe clearance at the lavatory. Photos: none
208	Lavatory – Knee and Toe Clearance at Den Bathroom	Is knee and toe clearance provided so that the clear space extends at least 19" under the lavatory? Note: one of two bathrooms provided where only one accessible bathroom is required.	11B-606.2	1115B.9.1.1	4.19.3	606.2	Barrier: the lavatory is provided with a base cabinet that provides no knee and toe clearance under the lavatory. Barrier Removal: modify the base cabinet to provide knee and toe clearance. Photos: 0730
209	Toilet – Clearance at Side at Bathroom	Is the distance from the side wall to the nearest obstruction minimum 60"? (current standards) minimum 48" to the wall and 36" to lavatory? (ADAAG) minimum 28" between the toilet and lavatory? (the 1998 CBC).	11B-604.3.1	1115B.7.2	4.16.2 & Fig. 28	604.3.1	Barrier: the distance between side wall and the lavatory counter is not 60" minimum, measured at 51". The distance between the toilet and the lavatory counter is less than 28", Measured at 24.5" to the lavatory counter. Barrier Removal: Modify the lavatory counter in order to provide more clearance. Photos: 0729 & 0730
210	Toilet – Location of flush Valve Control at Bathroom	Is the flush valve located on the wide side of the toilet area?	11B-604.6	1502.0	4.16.5	604.6	Barrier: The flush valve is located at the wall side of the toilet area rather than the wide side. Barrier Removal: Replace flush tank with one with the flush valve handle located at the wide side. Photos: 0726

Brookdale – Brookhurst Facility

15302 Brookhurst St., Westminster, CA 92683

Access Compliance Evaluation Survey Barrier Report

Survey Date: June 19, 2019 / Report Date: August 5, 2021

Item	Element	Item Requirement	2019 CBC	1998 CBC & CPC	ADAAG	2010 ADA Standards	Barrier, Barrier Removal and Photos
211	Toilet – Toilet Paper Dispenser Location at Bathroom	Is the centerline of the toilet paper dispenser located 7" to 9" from the front of the toilet to the centerline of the dispenser? (current standards) located within 12" from the front of the toilet? (the 1998 CBC) entire dispenser within 36" of the rear wall? (the ADAAG).	11B-604.7.1	1115B.9.3 & Fig. 85	4.16.6 & Fig. 29(b)	604.7.1	Barrier: The location of this dispenser does not conform to any standard: The centerline of the dispenser is not 7" to 9" in front of the front of the toilet, nor within 12" of the front of the toilet, nor within 36" of the back wall. It is located more than 36" from the rear wall and 13" in front of the toilet. Barrier Removal: Relocate the surface mounted toilet paper dispenser Photos: 0725
212	Grab Bar – Obstructed Above/Below at Bathroom	Is the area minimum 12" above the grab bar and minimum 1.5" below and at sides of the grab bar clear of projecting elements?	11 B-609.3	1133B.4.2.5 ,1133B.5.5. 1 & Fig. 11B-36	4.26.2	609.3	Barrier: The area above and to the sides of the rear grab bar are not clear; a cabinet obstructs the gripping areas of the grab bar. Barrier Removal: Remove the cabinet. Photos: 0726
213	Grab Bar – Location of Side Bar at Bathroom	Does the side grab bar extend a minimum of 54" from the rear wall? (ADAAG) and extend a minimum of 24" in front of the toilet? (CBC). Does the side grab bar begin a maximum of 12" from the rear wall?	11B-604.5.1	1115B.8.1	4.17.6 & Fig. 29 & 30	604.5.1	Barrier: The Side grab bar does not begin within 12" of the rear wall, measured at 14.75" from rear wall. Barrier Removal: Relocate the grab bar. Photos: 0727
214	Shower – Threshold at Bathroom	Is the entrance to the shower free of a raised threshold or curb? (ADAAG) or a threshold that is ½" maximum and beveled 1:1? (1998 CBC) threshold that is ½" maximum with the portion between ¼" high and ½" high sloping at 1:2? (current standards).	11B-608.7	1115B.6.2.2	4.21.7	608.7	Barrier: the shower threshold is 1.0" high when compressed under load. Barrier Removal: remove threshold Photos: 0720
215	Shower – Floor Level at Bathroom	Is the shower floor surface sloped a maximum of 1:48 (2.1%) and drains flush with the surface? (1998 and CBC and ADAAG) conforming to level change requirements for an accessible route? (2010 ADA).	11B-609.9	1115B.6.2.4 .4	4.37	309	Barrier: the drain is depressed ½" below the level of the adjacent shower floor. Barrier Removal: provide a spacer to raise the drain cover to be flush with the shower floor. Photos: 0718 & 0721
216	Shower – Seat Clearance to Wall at Den Bathroom	Is the seat located so that in the deployed position the rear edge is within 2.5" of the wall and the side edge within 1.5" of the wall?	11B-610.3.1	1115B.6.2.4 .5	4.21.3	610.3.1	Barrier: the seat is located so that there is a 3" gap between the edge of the seat and the side wall, rather than 1.5" maximum. Barrier Removal: relocate folding seat on wall. Photos: 0723

Jeff Mastin, CASp-0088



Brookhurst # 0002



Brookhurst # 0003



Brookhurst # 0005



Brookhurst # 0006



Brookhurst # 0008



Brookhurst # 0009



Brookhurst # 0010



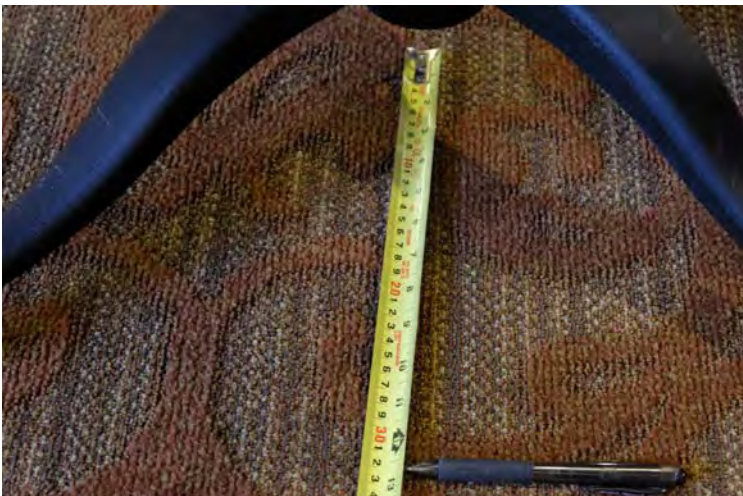
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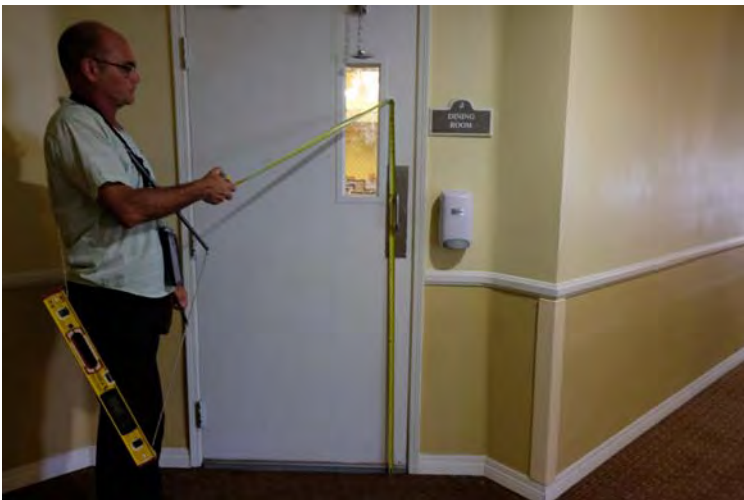
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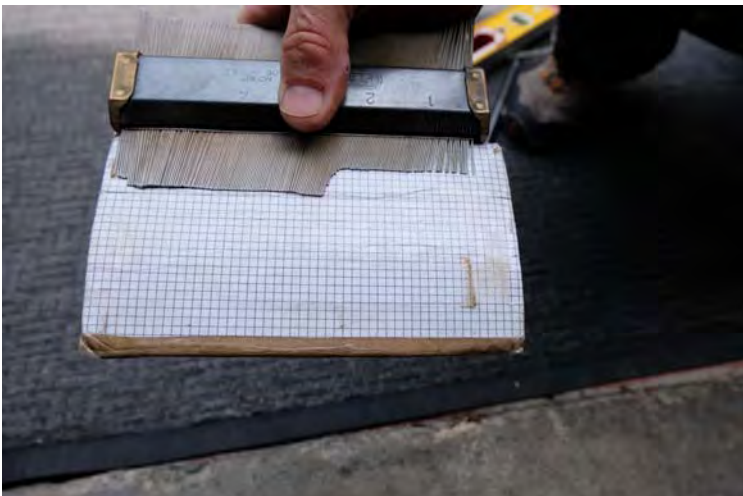
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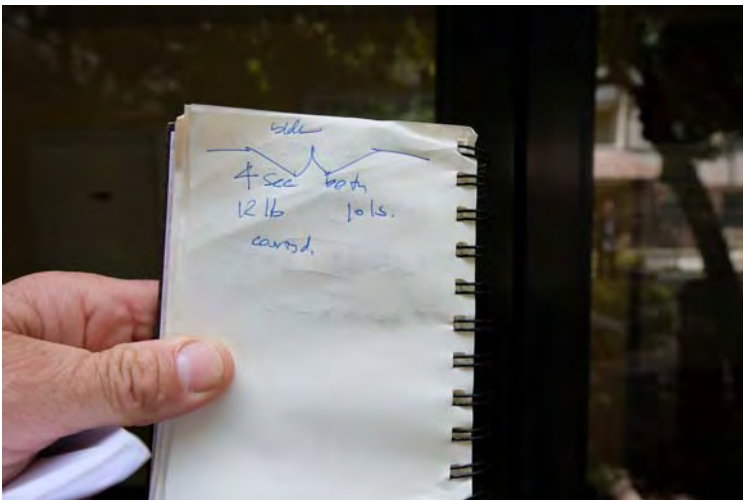
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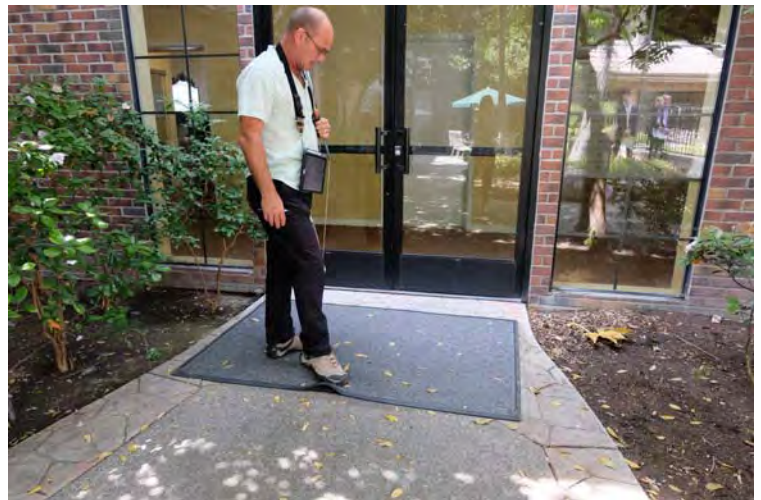
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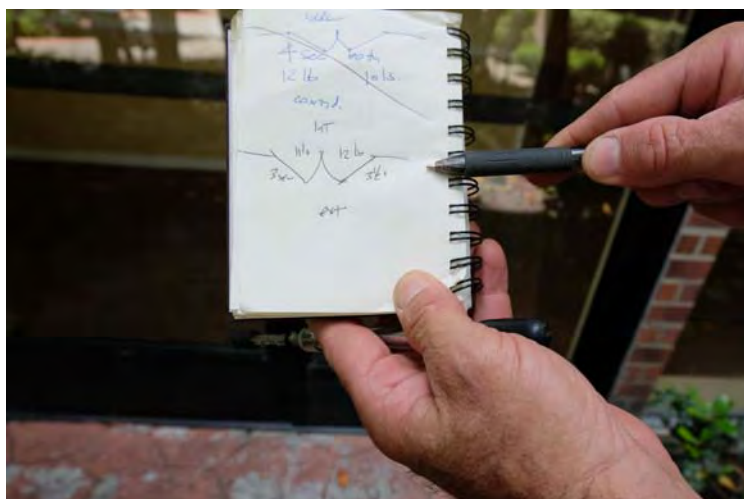
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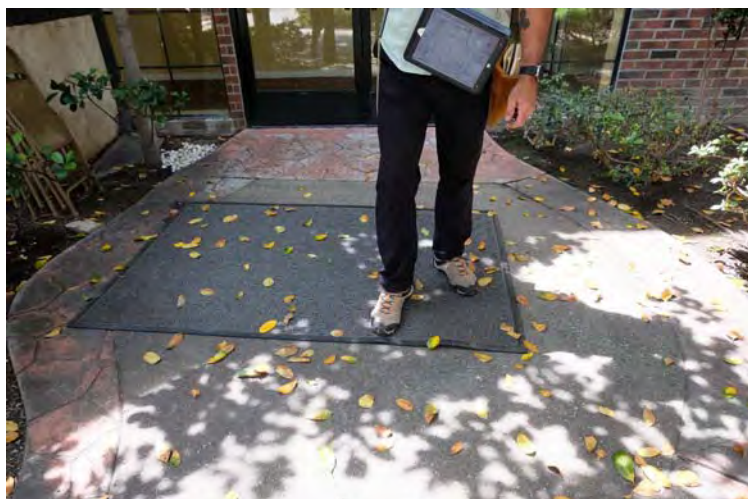
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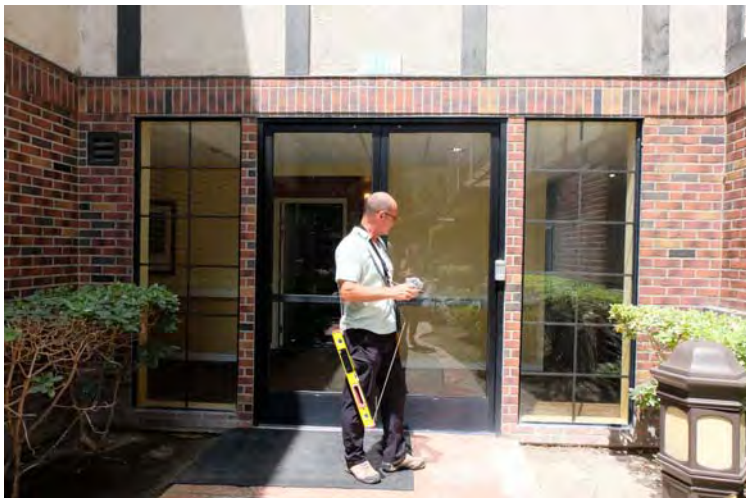
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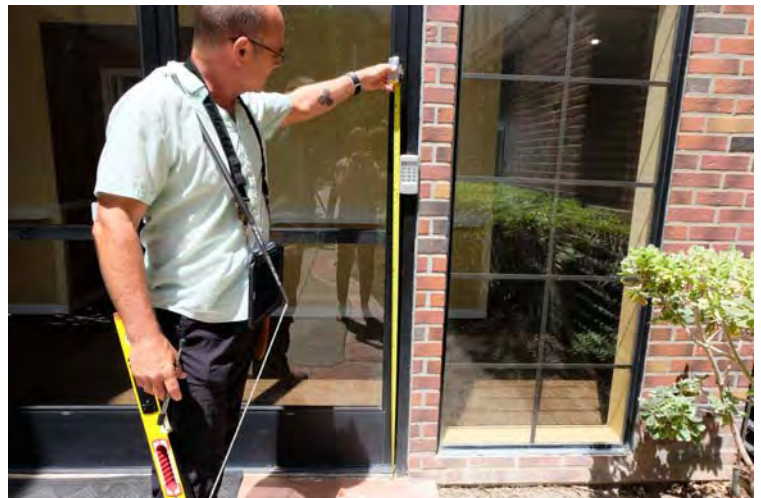
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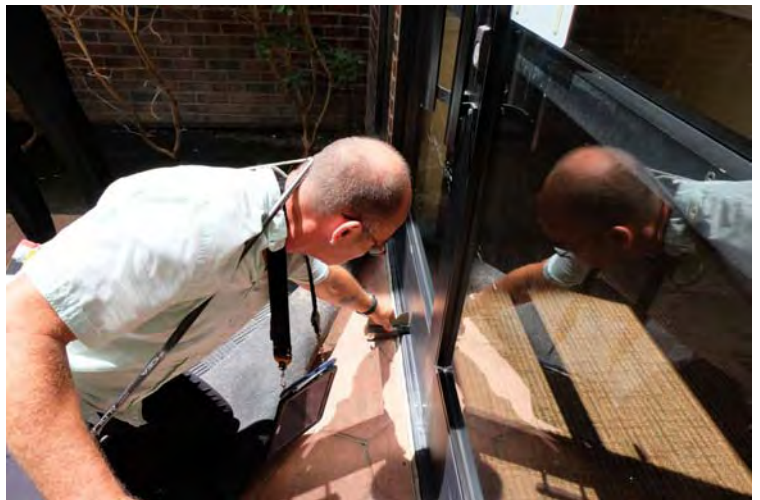
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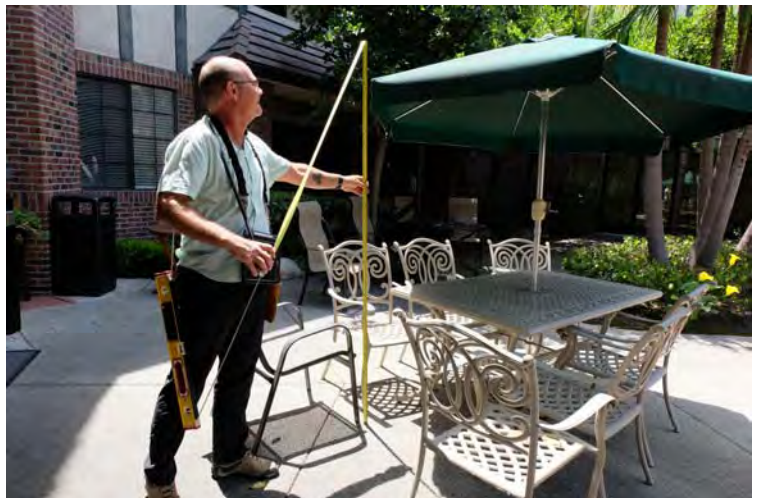
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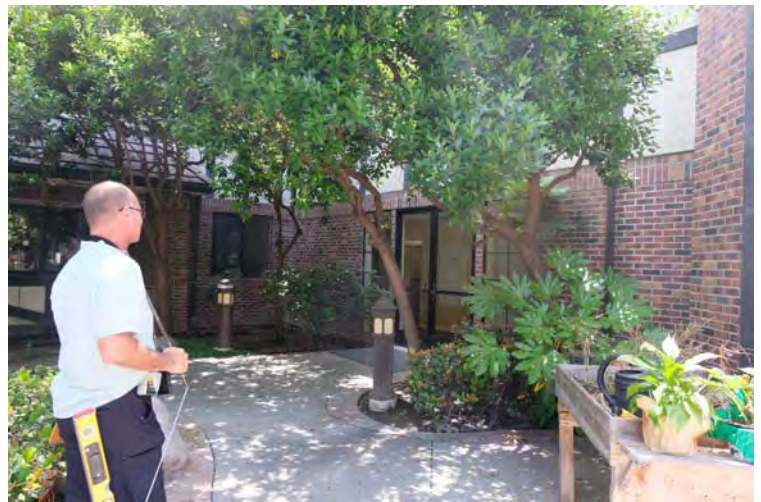
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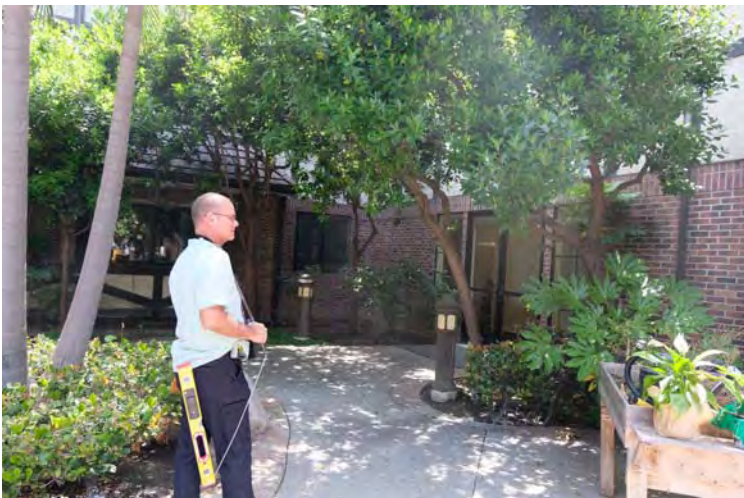
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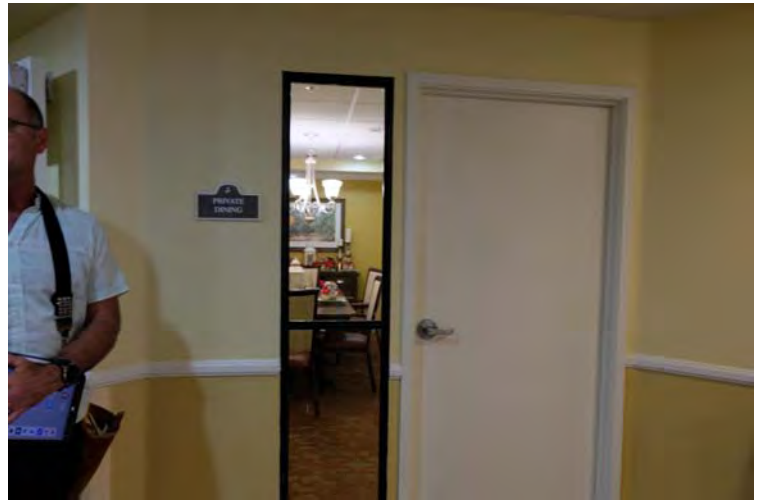
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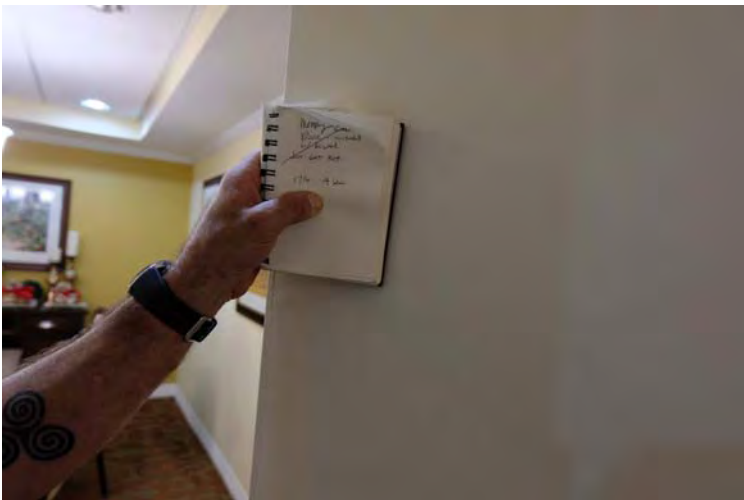
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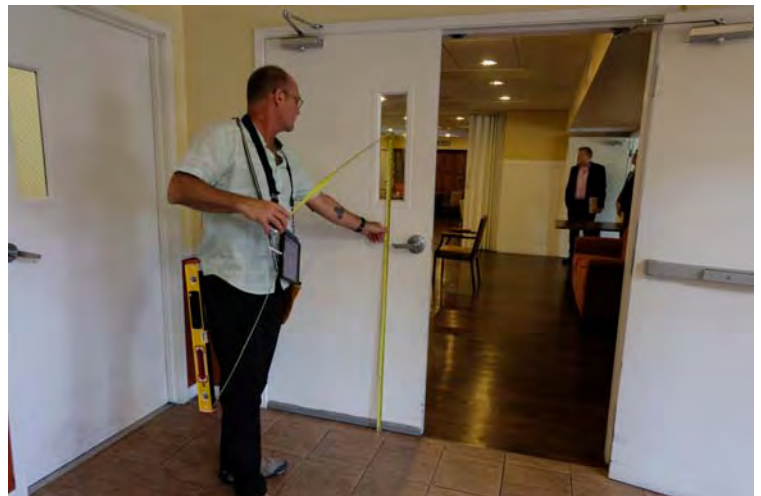
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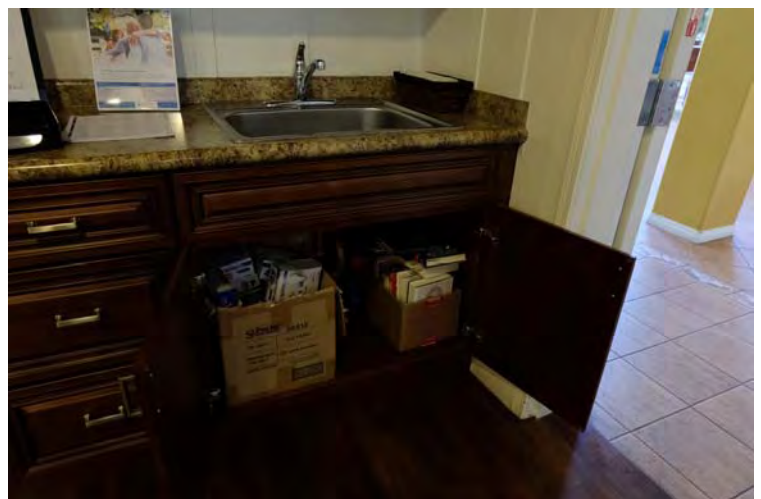
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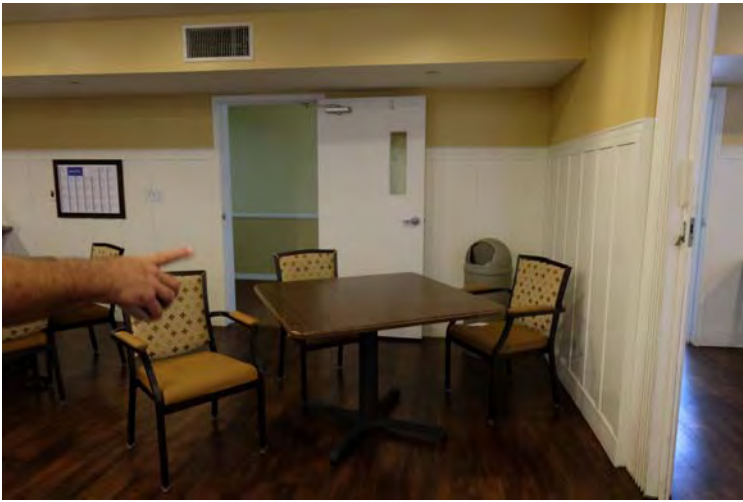
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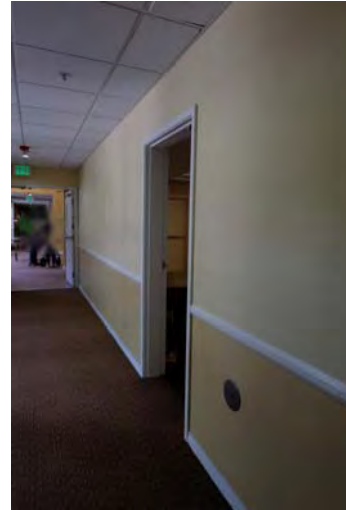
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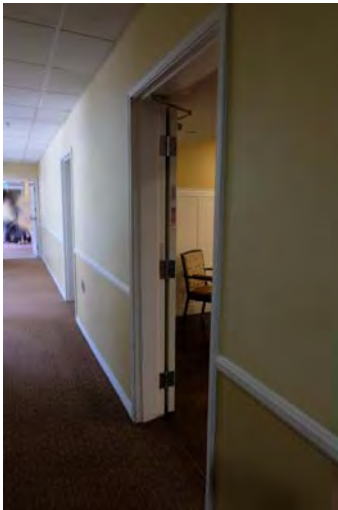
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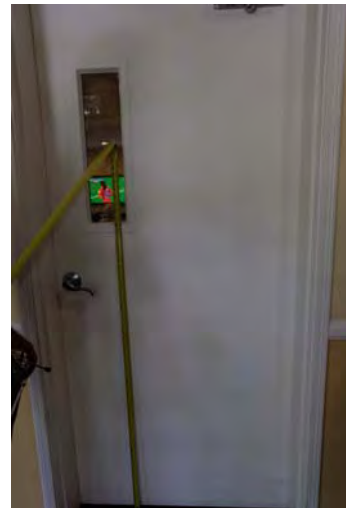
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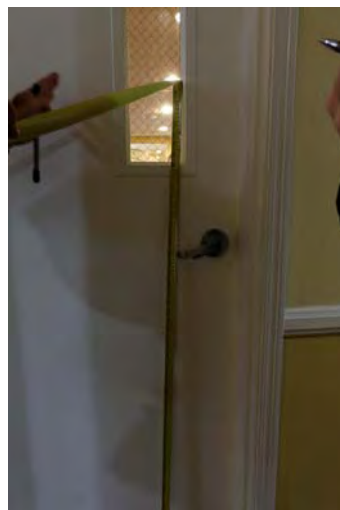
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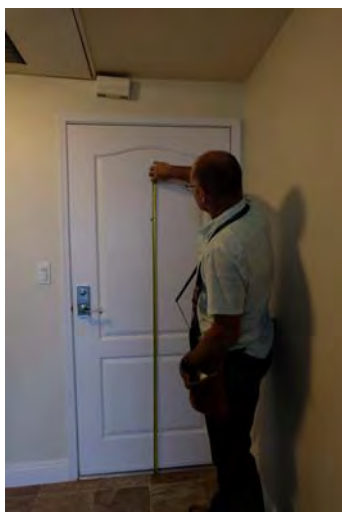
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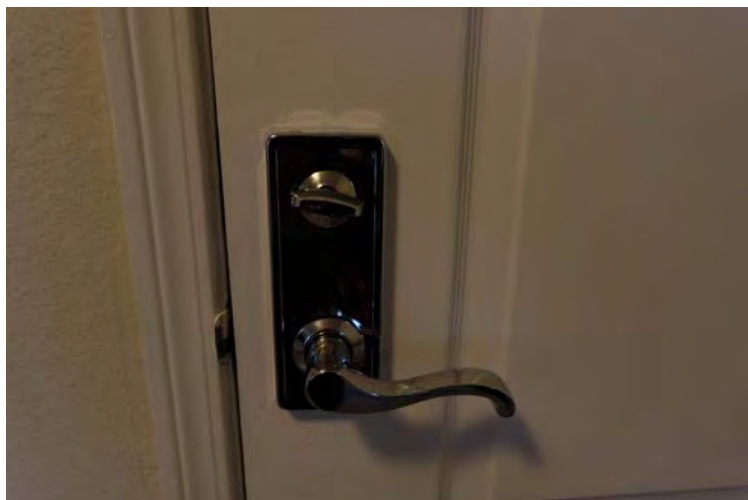
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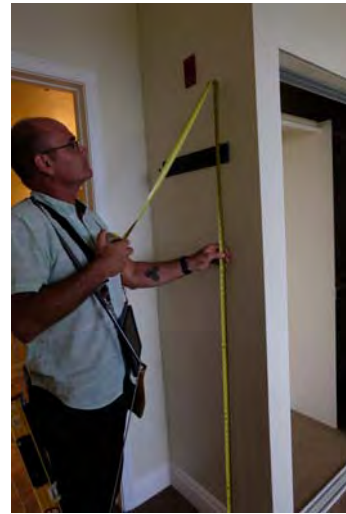
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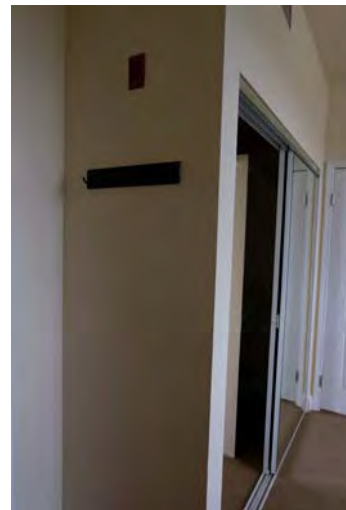
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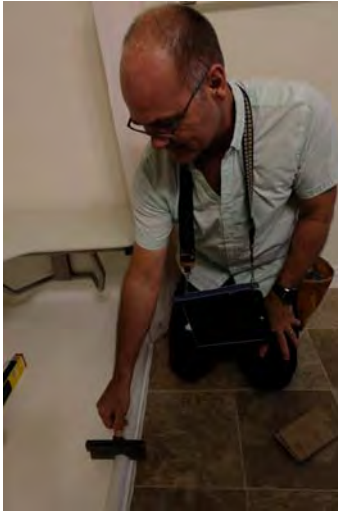
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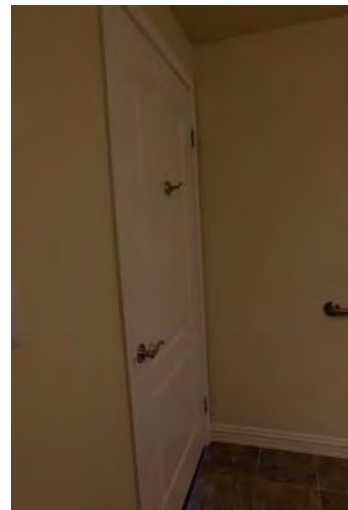
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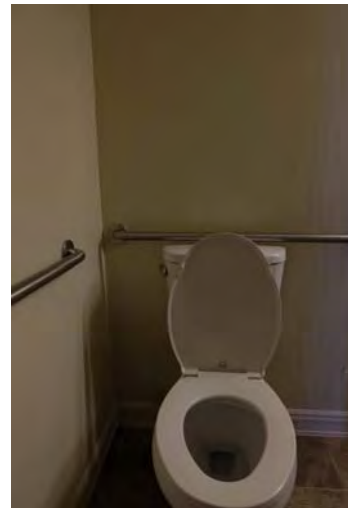
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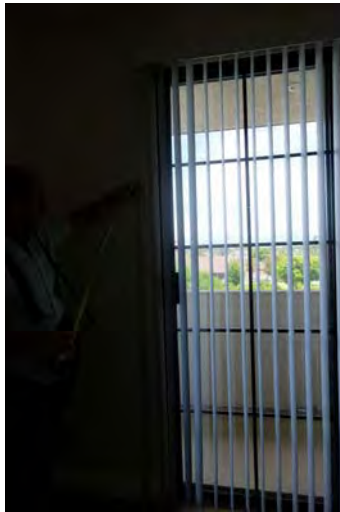
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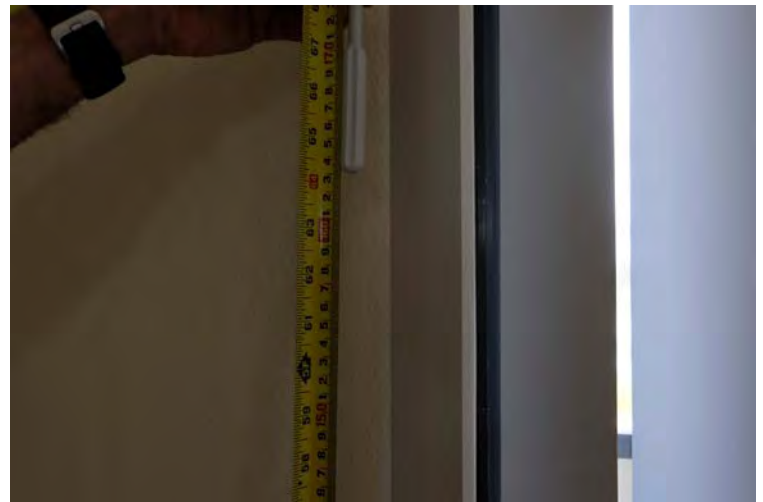
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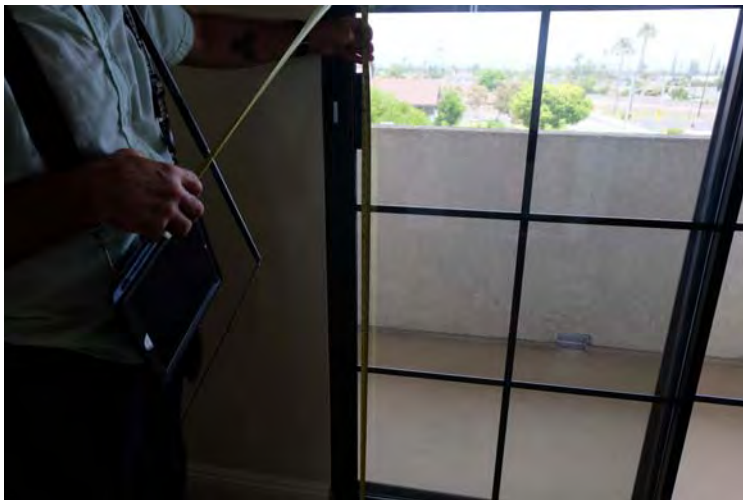
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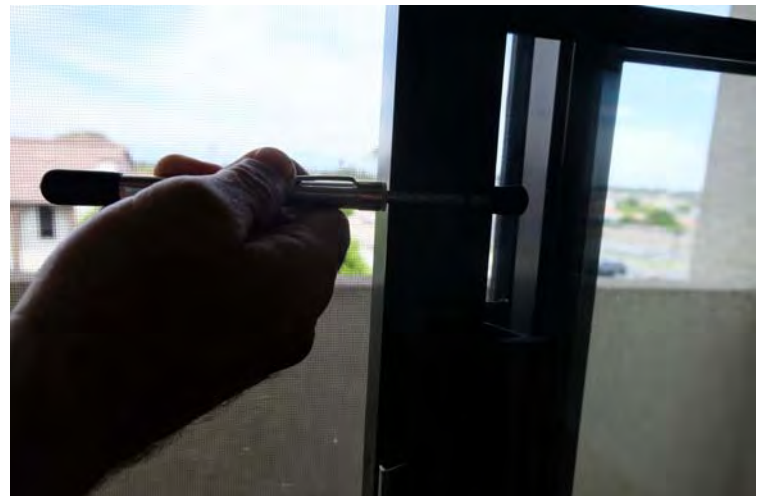
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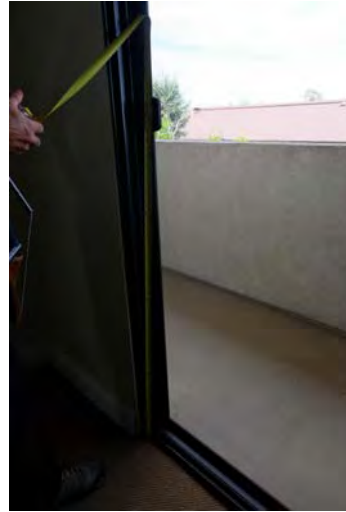
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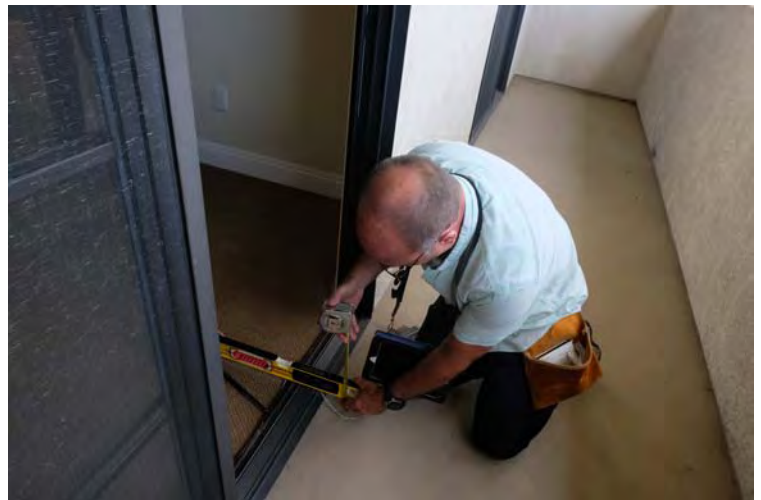
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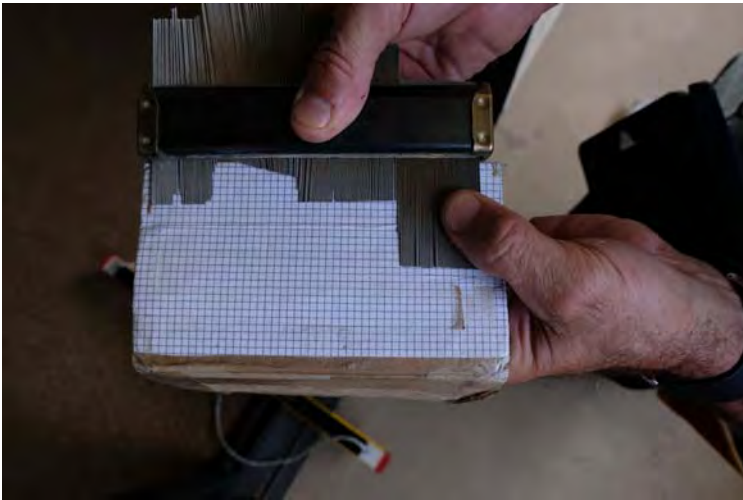
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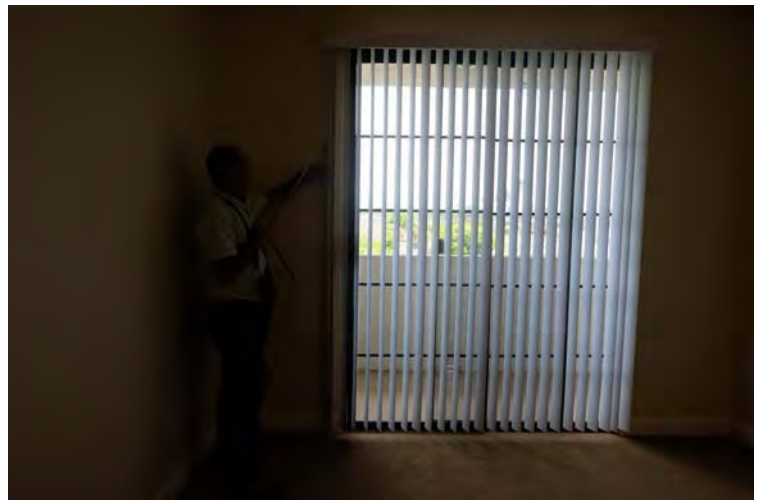
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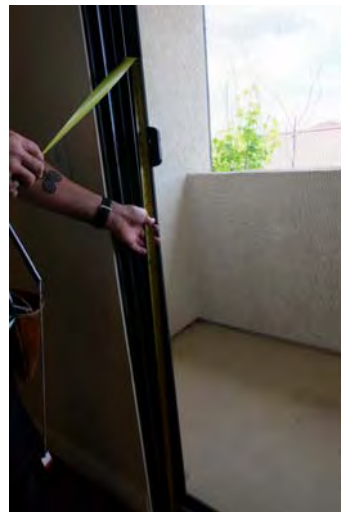
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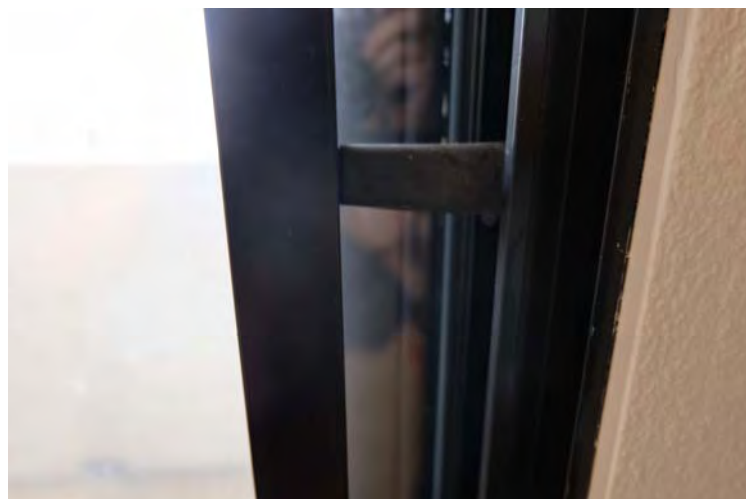
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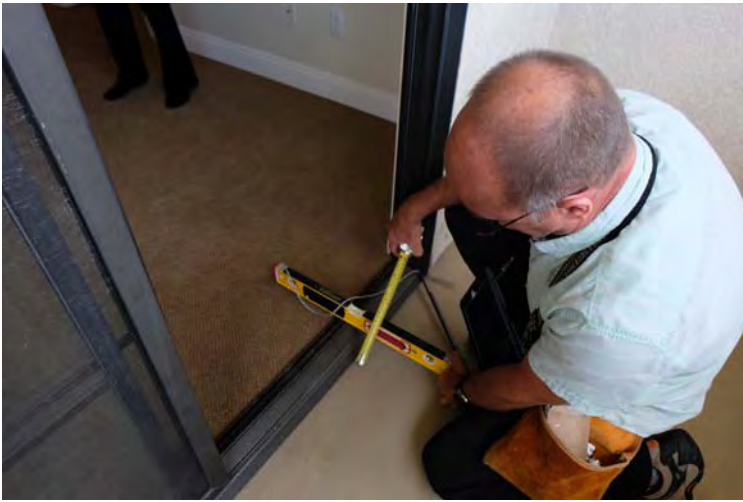
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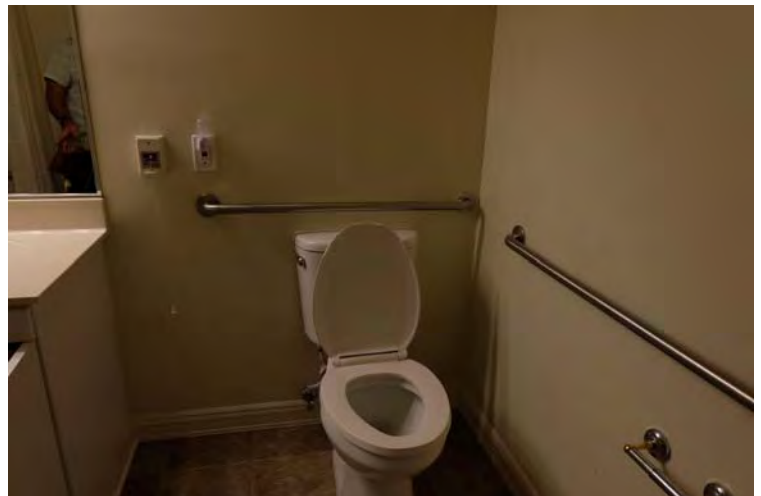
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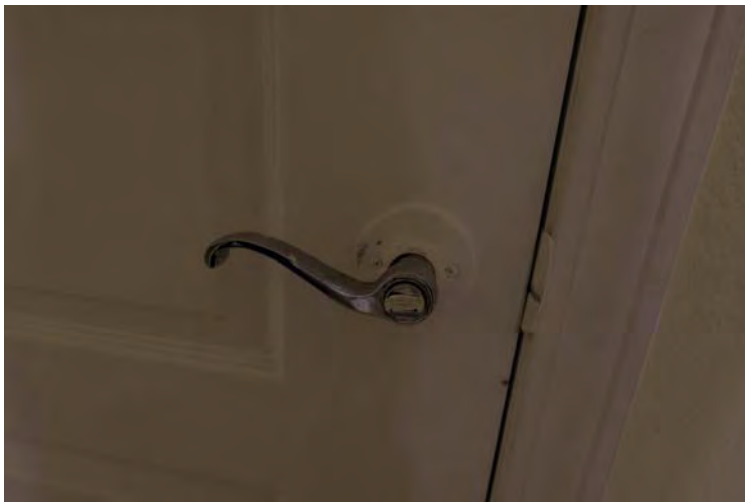
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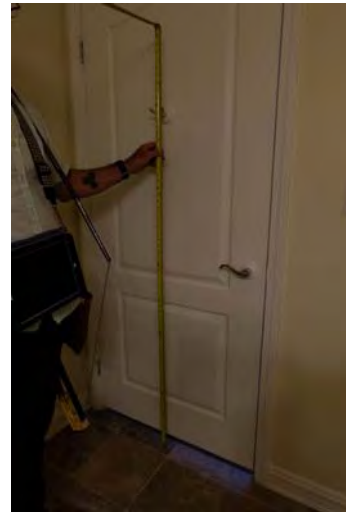
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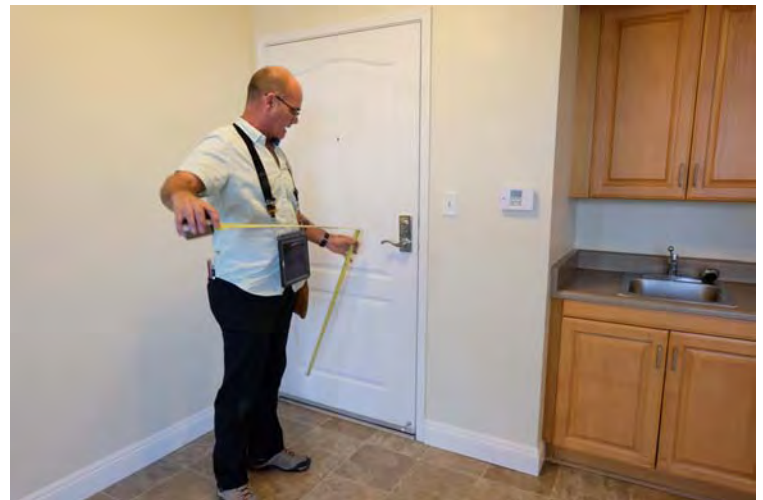
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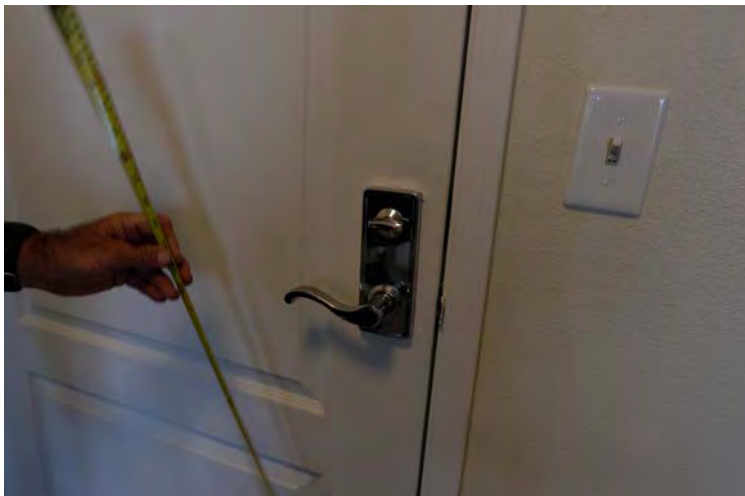
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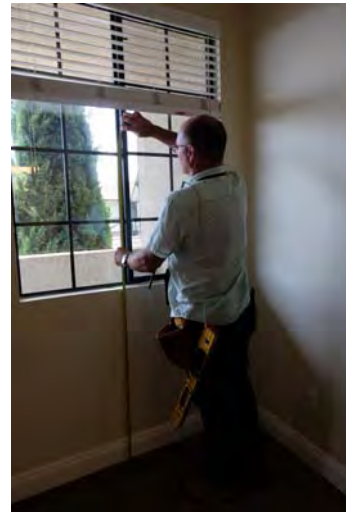
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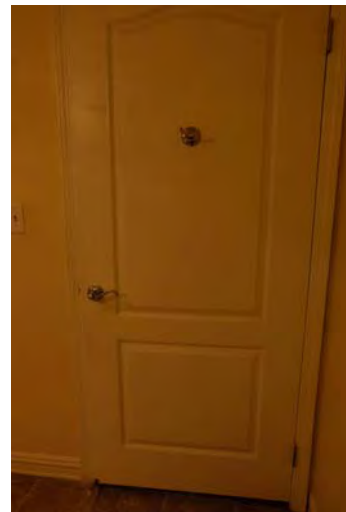
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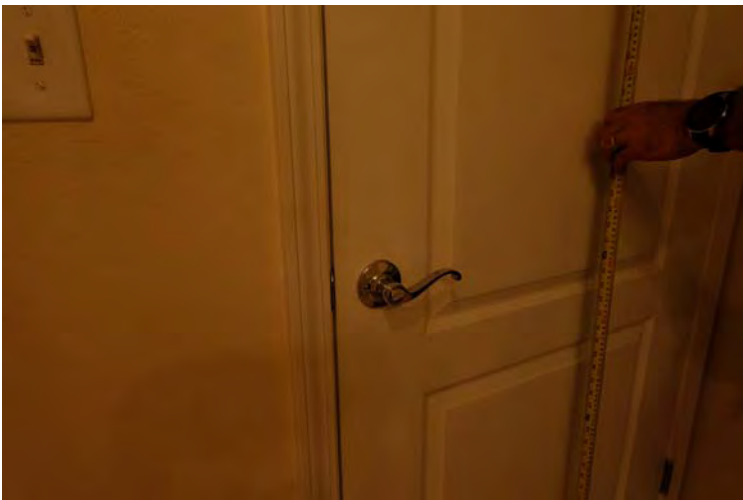
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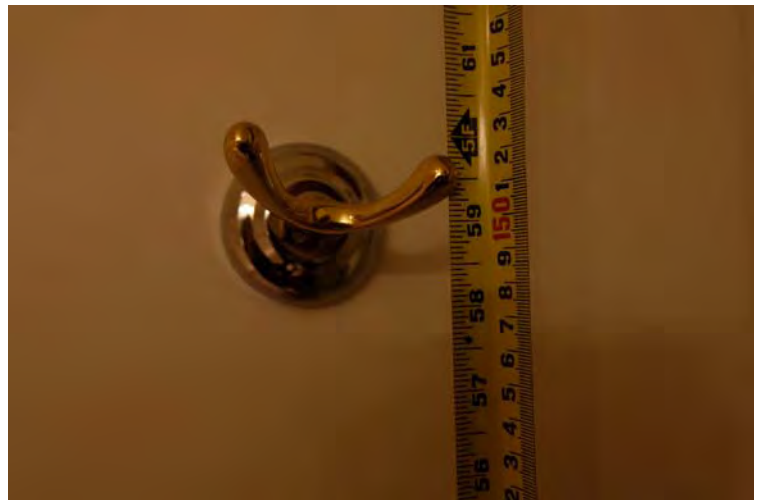
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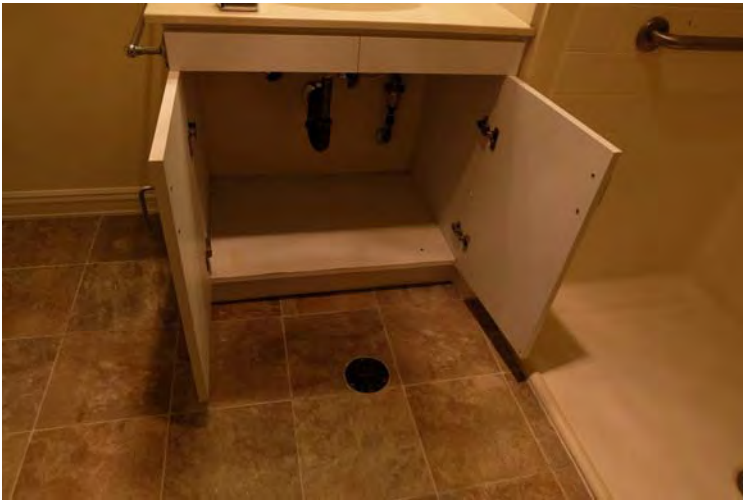
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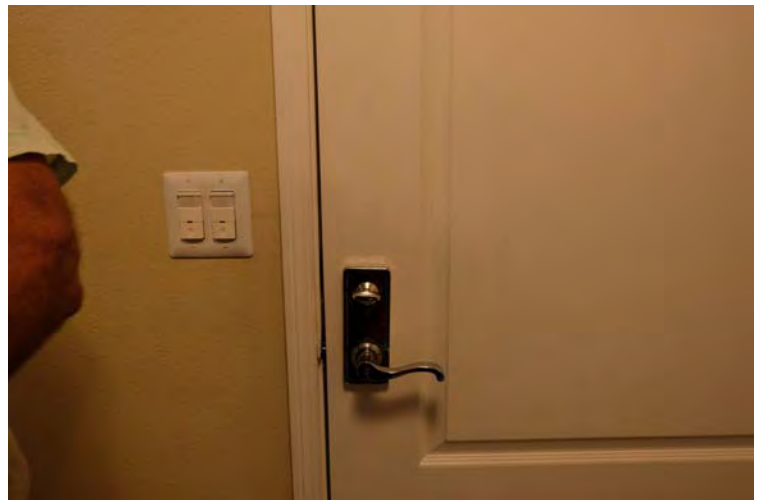
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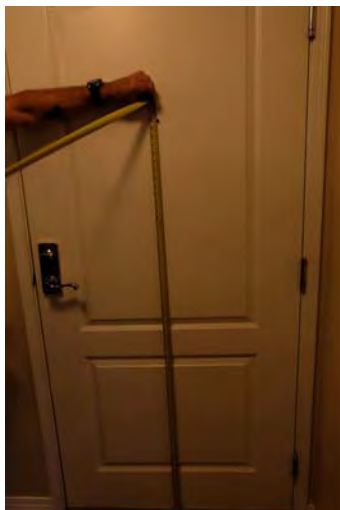
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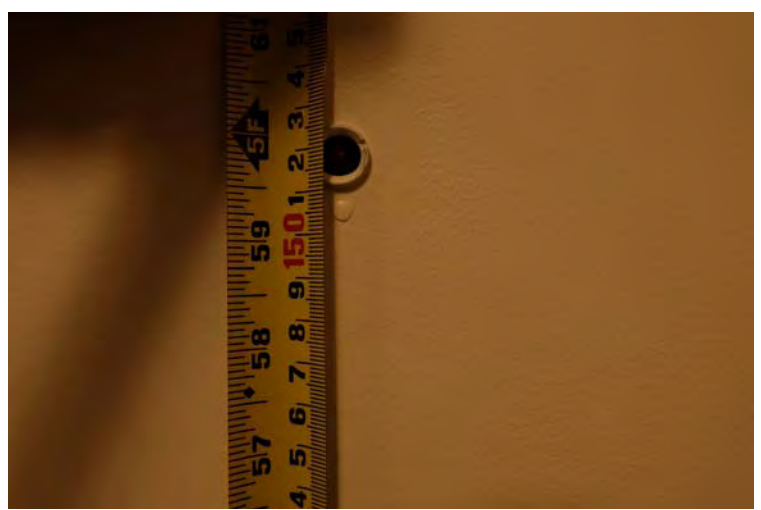
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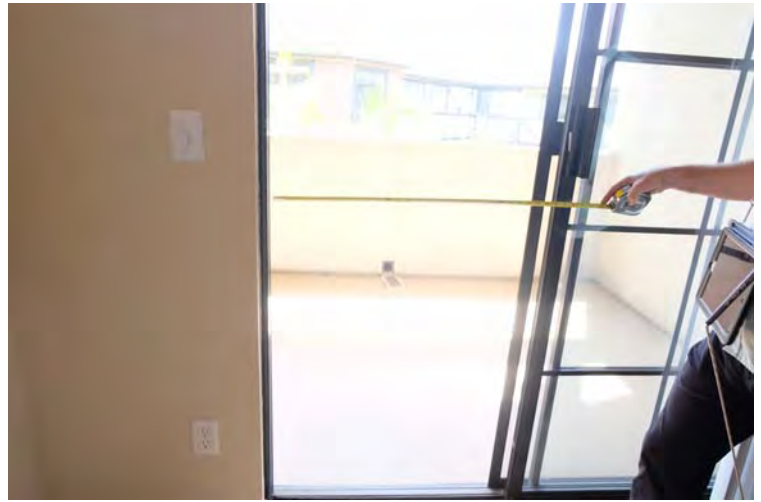
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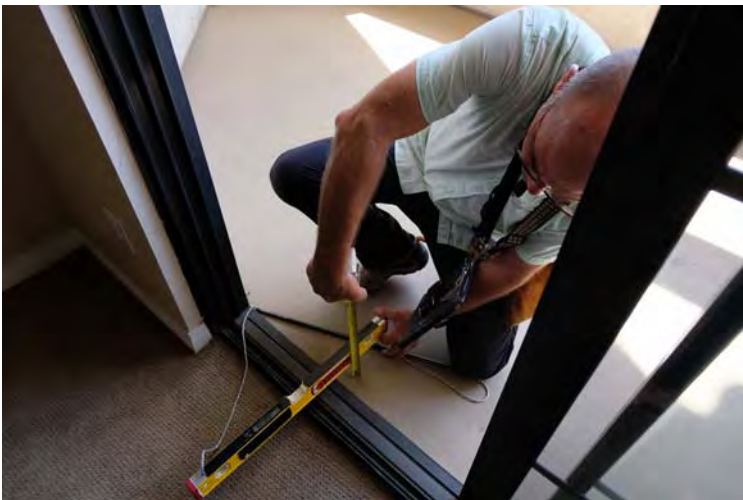
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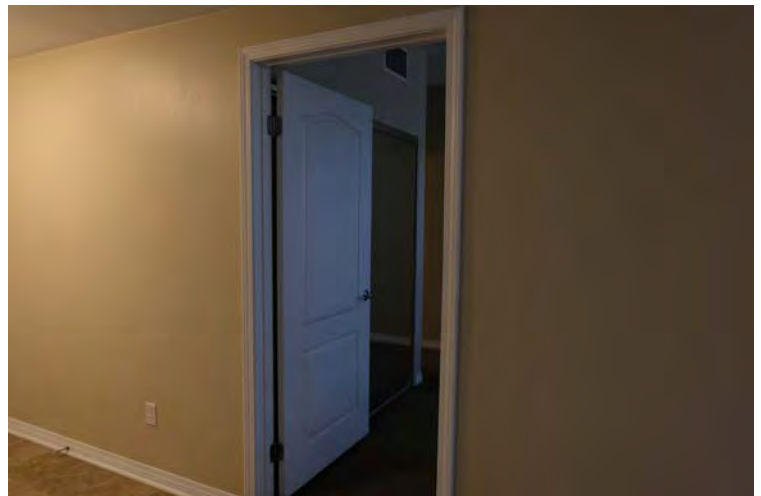
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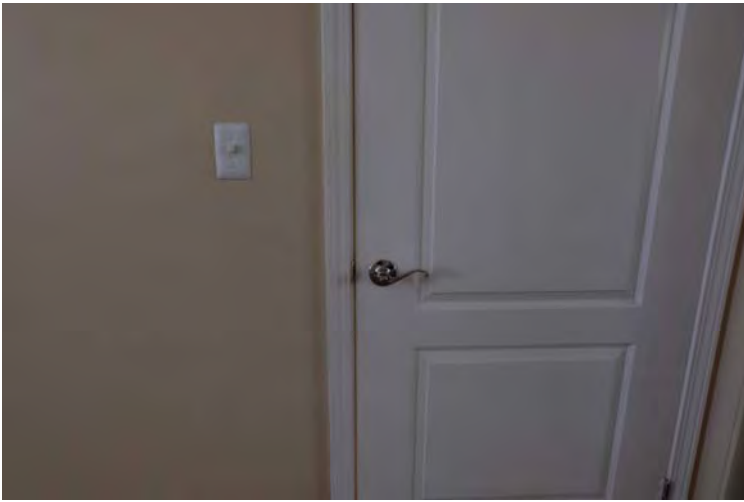
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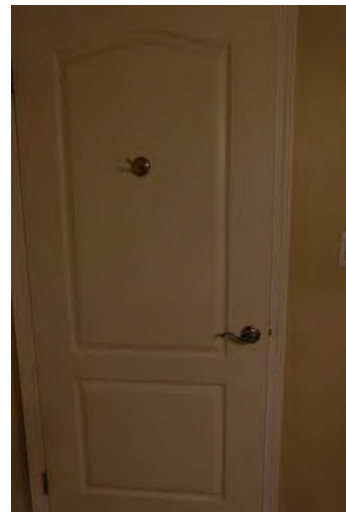
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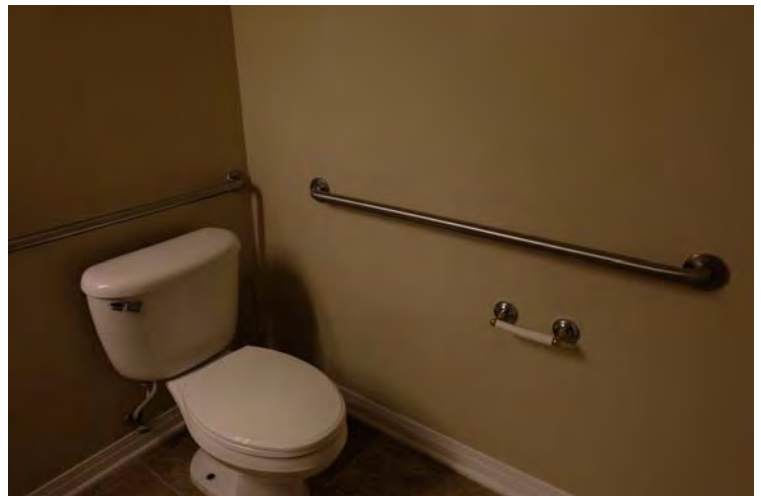
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Brookhurst # 0392



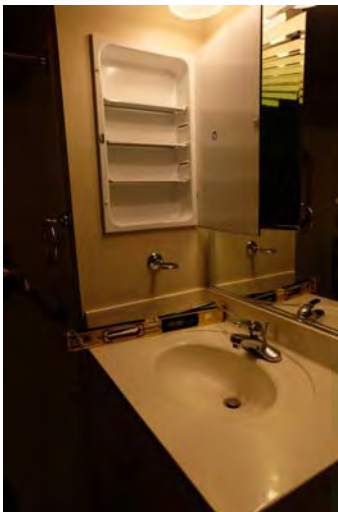
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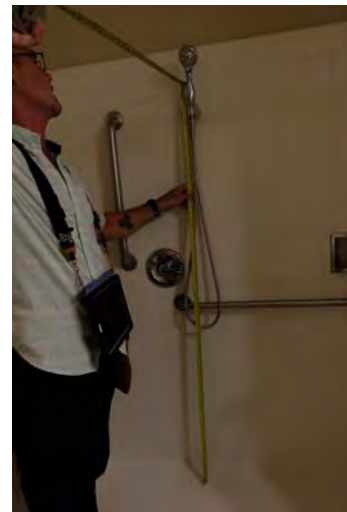
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Brookhurst # 0396



Brookhurst # 0398



Brookhurst # 0399



Brookhurst # 0400



Brookhurst # 0402



Brookhurst # 0403



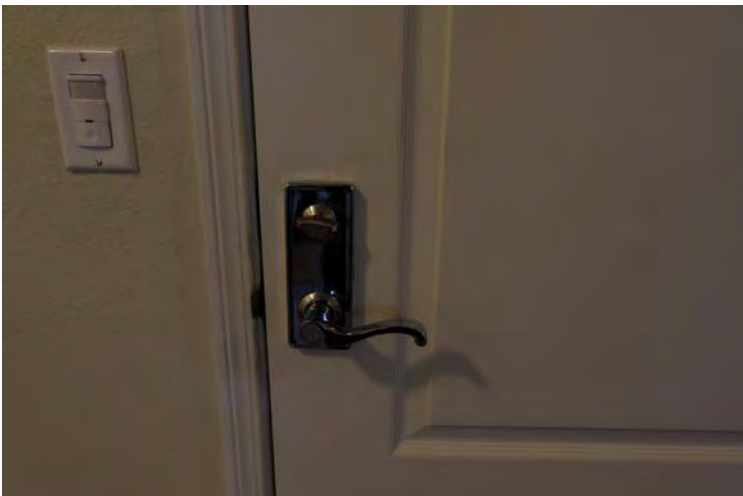
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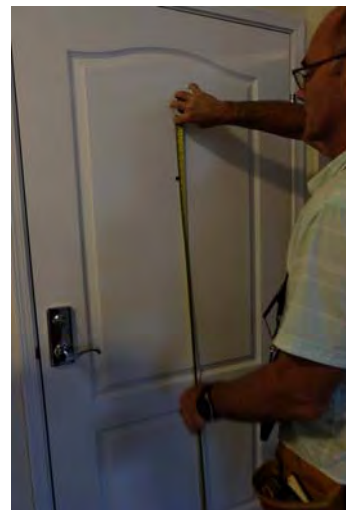
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Brookhurst # 0408



Brookhurst # 0409



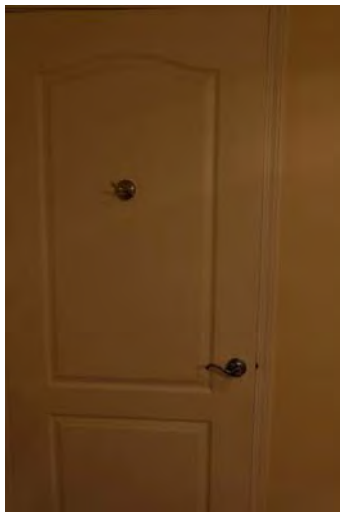
Brookhurst # 0412



Brookhurst # 0413



Brookhurst # 0414



Brookhurst # 0415



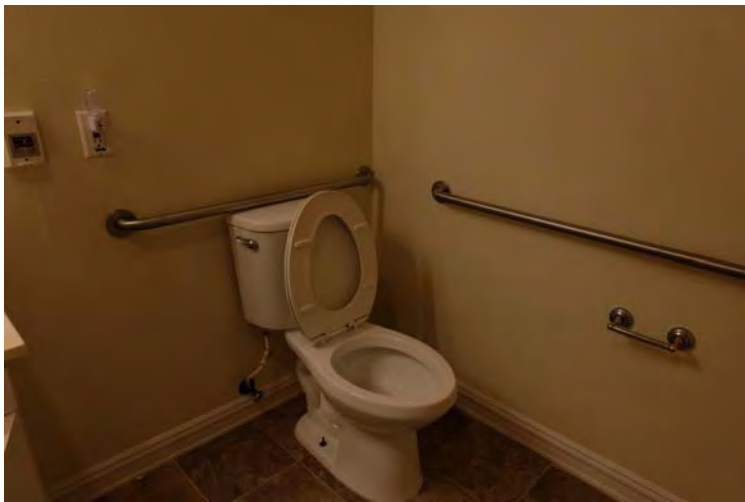
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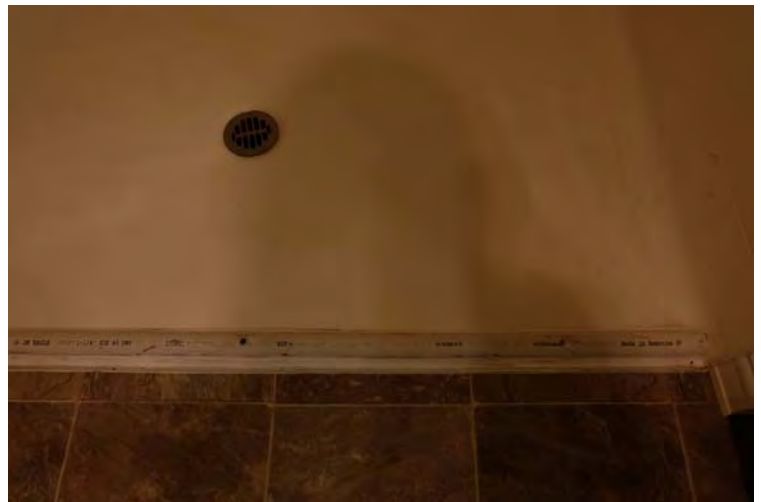
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Brookhurst # 0419



Brookhurst # 0421



Brookhurst # 0422



Brookhurst # 0426



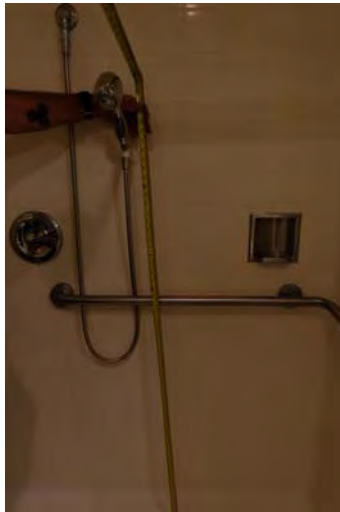
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Brookhurst # 0429



Brookhurst # 0430



Brookhurst # 0431



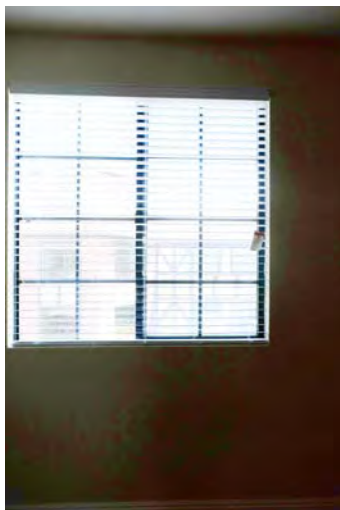
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Brookhurst # 0434



Brookhurst # 0435



Brookhurst # 0436



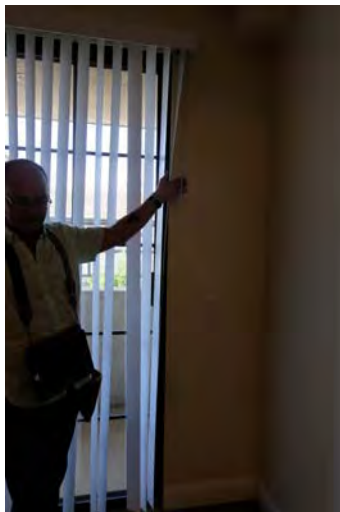
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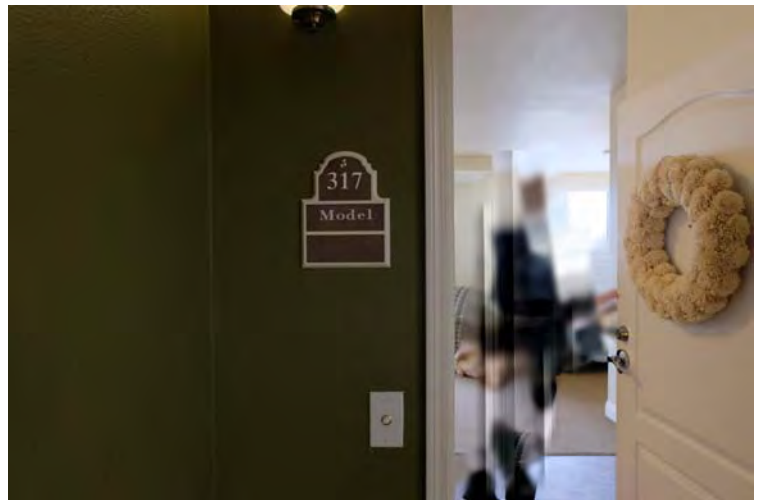
Brookhurst # 0438



Brookhurst # 0439



Brookhurst # 0441



Brookhurst # 0443



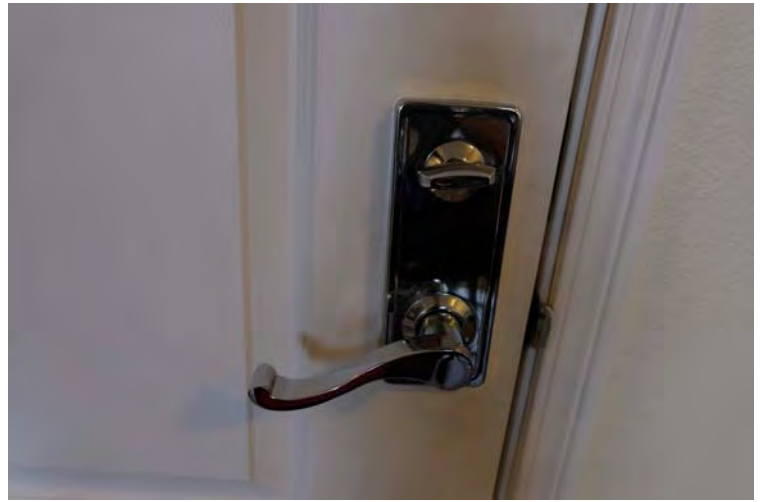
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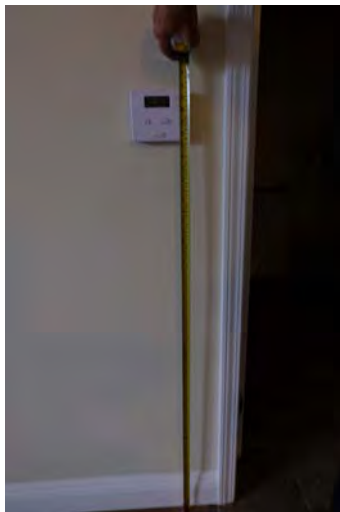
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Brookhurst # 0447



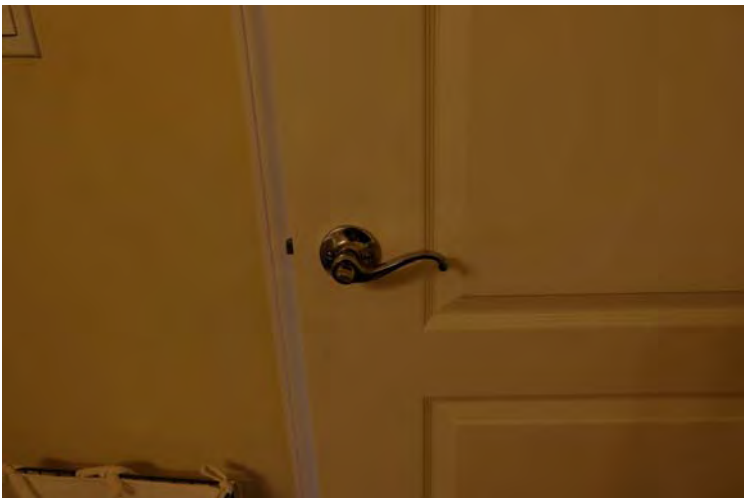
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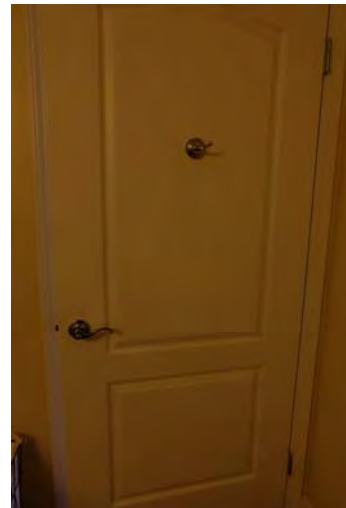
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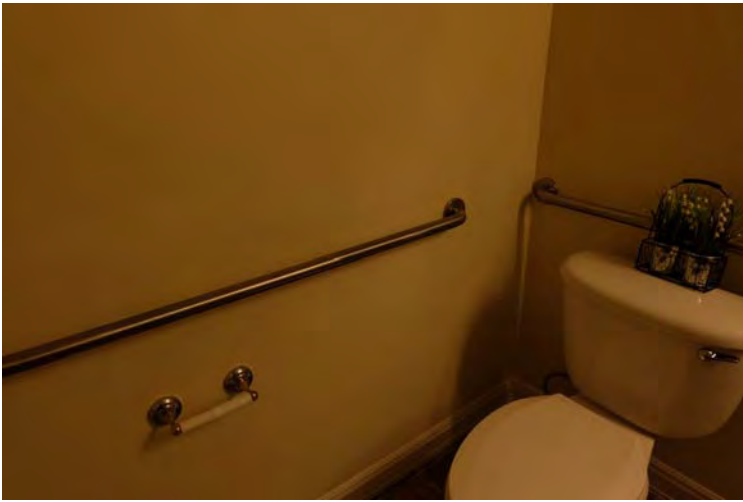
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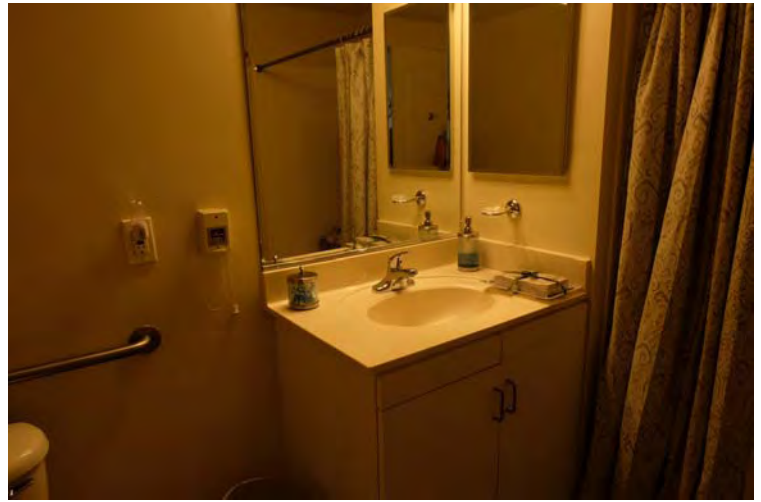
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Brookhurst # 0456



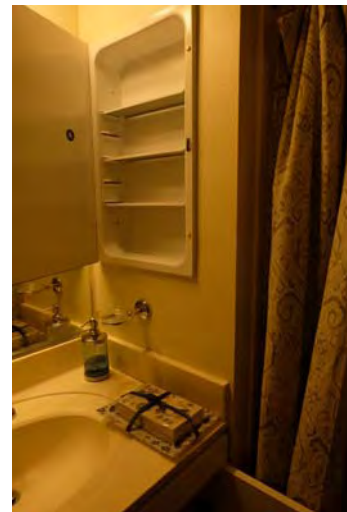
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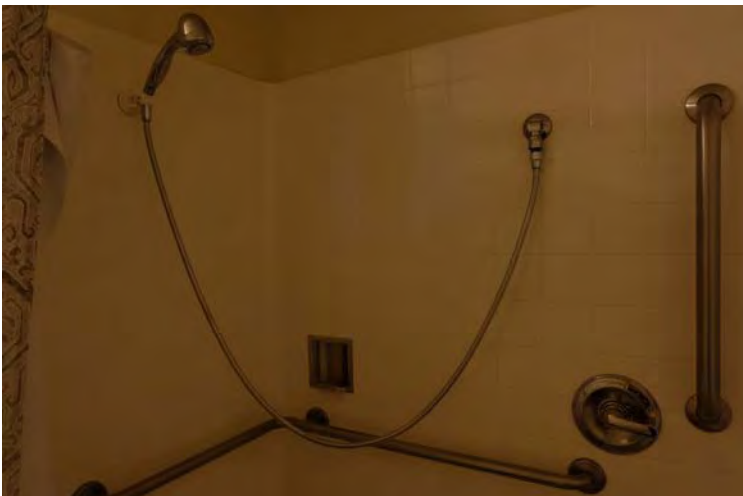
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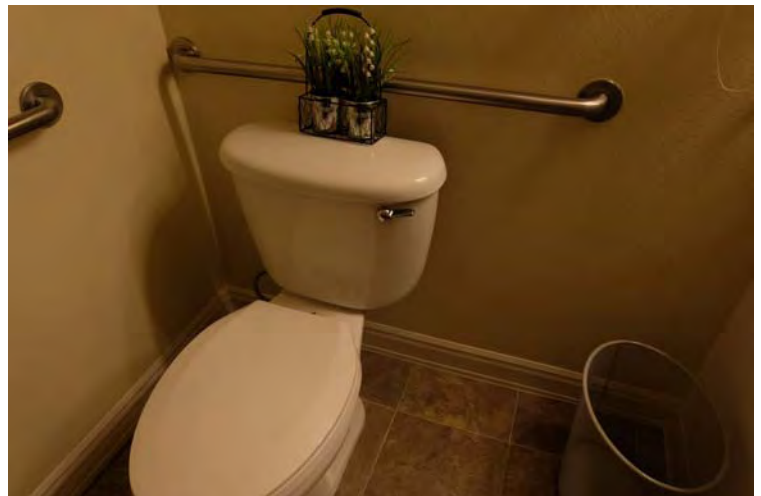
Brookhurst # 0459



Brookhurst # 0460



Brookhurst # 0461



Brookhurst # 0466



Brookhurst # 0467



Brookhurst # 0468



Brookhurst # 0469



Brookhurst # 0470



Brookhurst # 0471



Brookhurst # 0472



Brookhurst # 0473



Brookhurst # 0474



Brookhurst # 0475



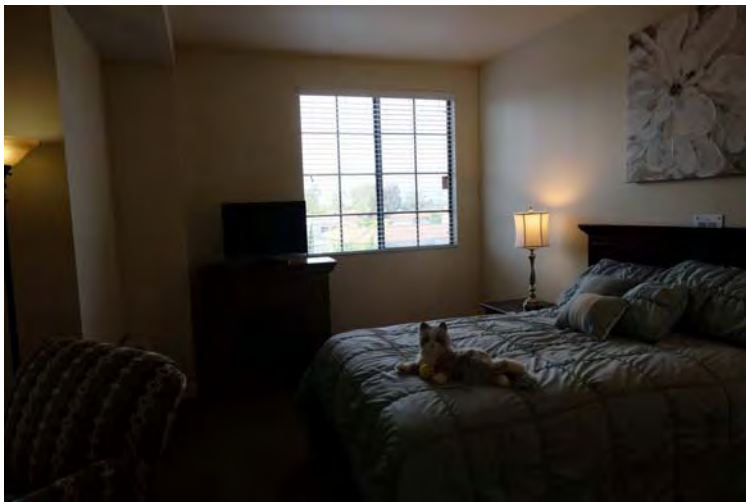
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Brookhurst # 0479



Brookhurst # 0480



Brookhurst # 0481



Brookhurst # 0482



Brookhurst # 0485



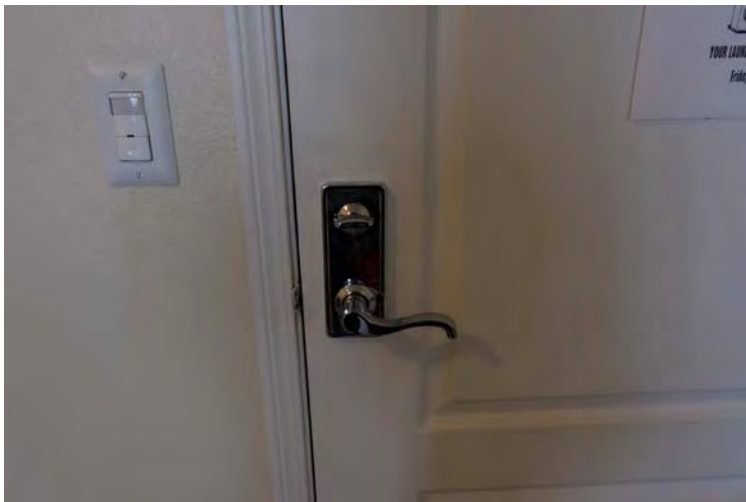
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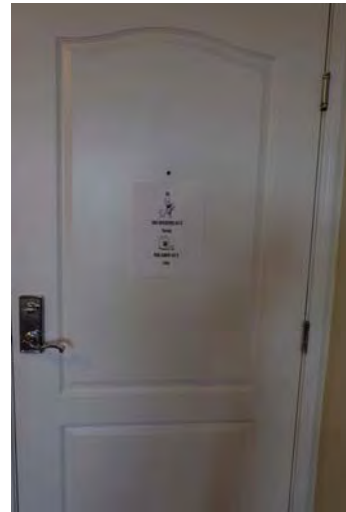
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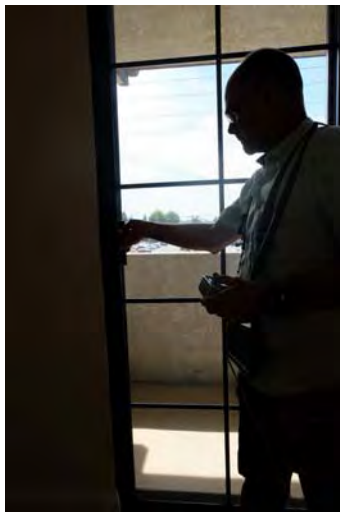
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Brookhurst # 0495



Brookhurst # 0496



Brookhurst # 0499



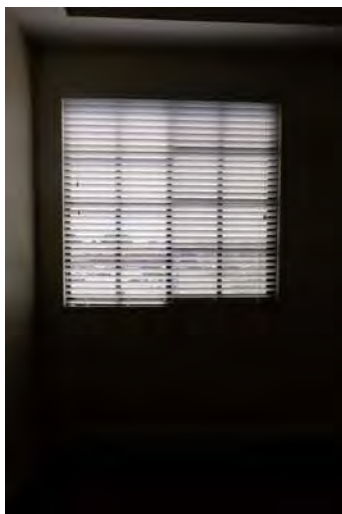
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Brookhurst # 0501



Brookhurst # 0504



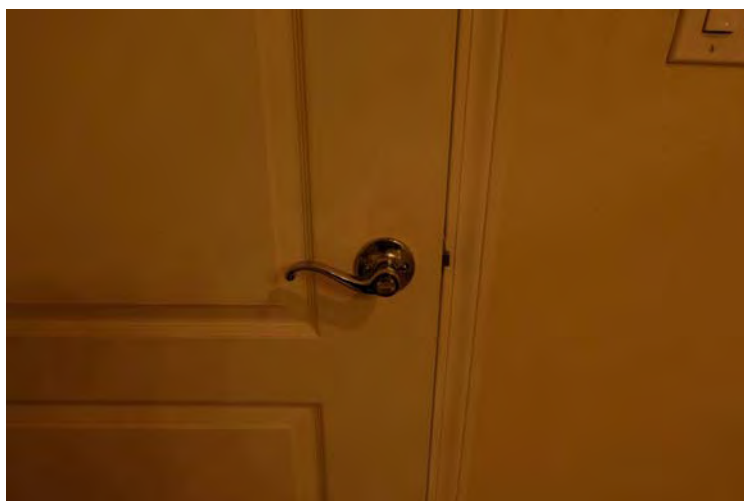
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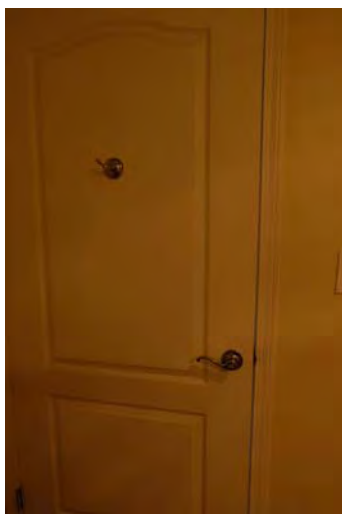
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Brookhurst # 0509



Brookhurst # 0510



Brookhurst # 0511



Brookhurst # 0514



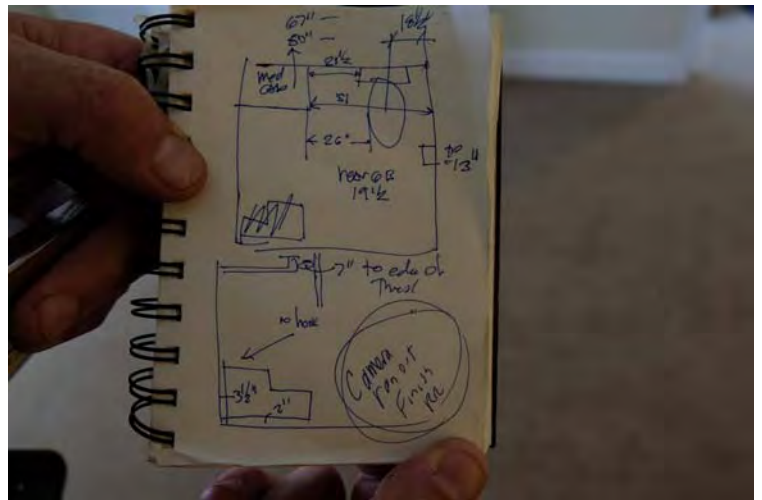
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Brookhurst # 0516



Brookhurst # 0517



Brookhurst # 0518



Brookhurst # 0519



Brookhurst # 0522



Brookhurst # 0523



Brookhurst # 0524



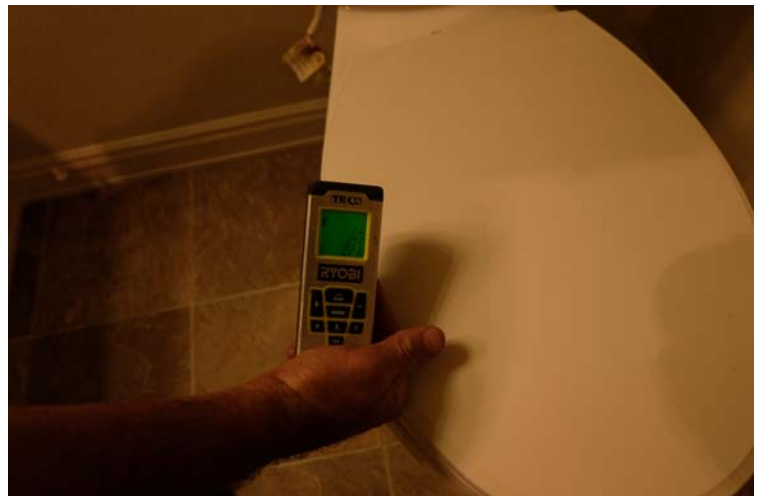
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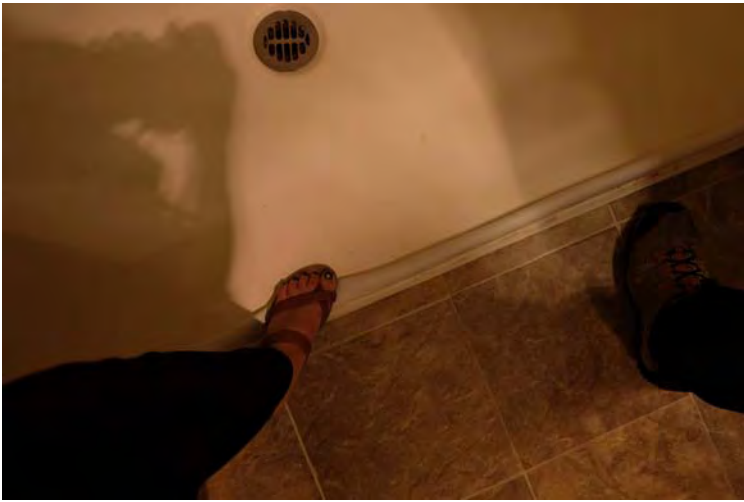
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Brookhurst # 0529



Brookhurst # 0530



Brookhurst # 0533



Brookhurst # 0534



Brookhurst # 0537



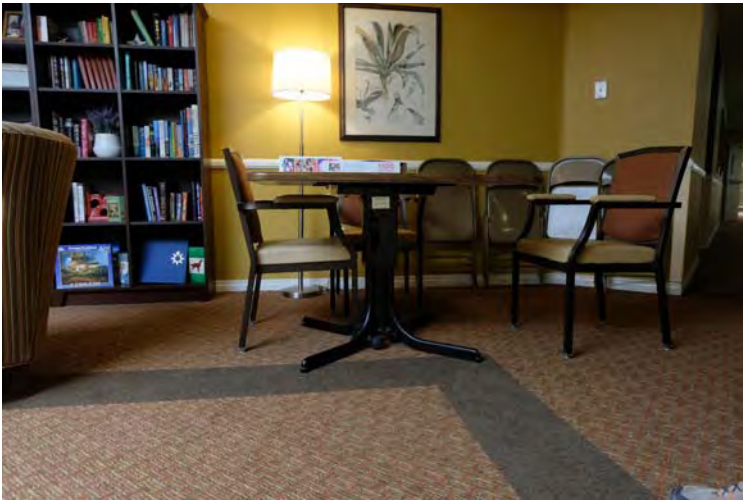
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Brookhurst # 0539



Brookhurst # 0540



Brookhurst # 0552



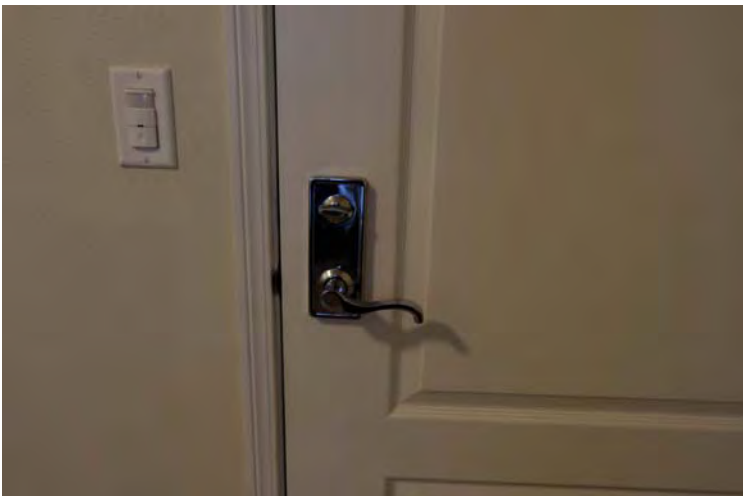
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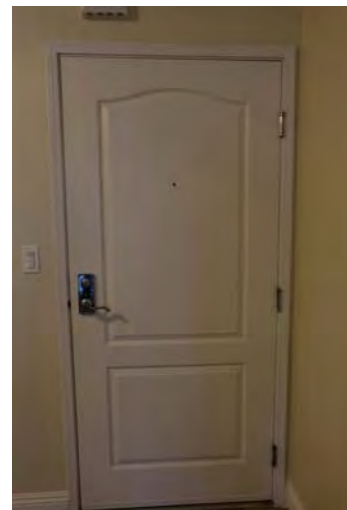
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Brookhurst # 0558



Brookhurst # 0562



Brookhurst # 0563



Brookhurst # 0564



Brookhurst # 0565



Brookhurst # 0569



Brookhurst # 0570



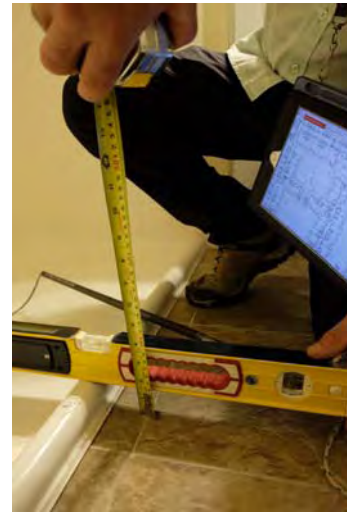
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Brookhurst # 0572



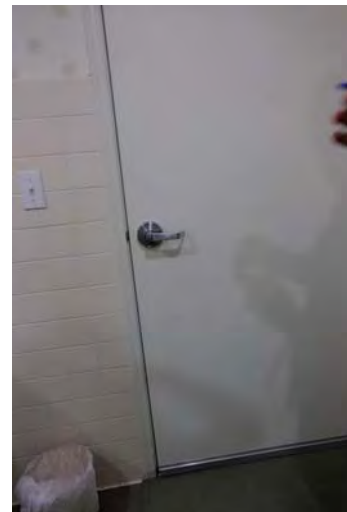
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Brookhurst # 0574



Brookhurst # 0579



Brookhurst # 0581



Brookhurst # 0582



Brookhurst # 0583



Brookhurst # 0584



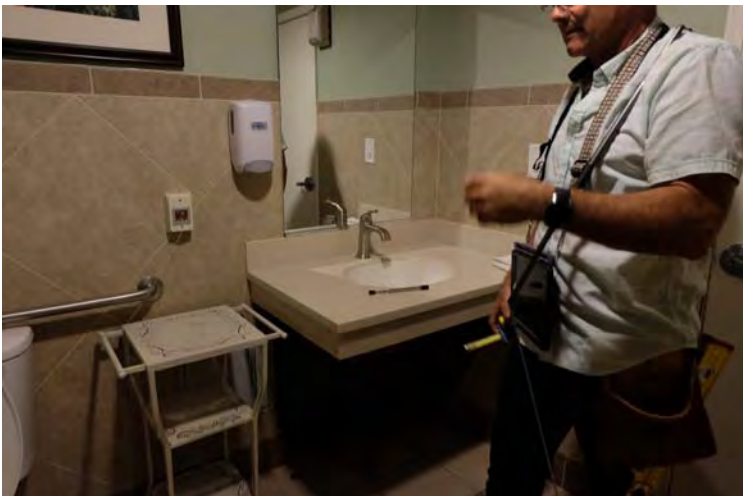
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Brookhurst # 0588



Brookhurst # 0589



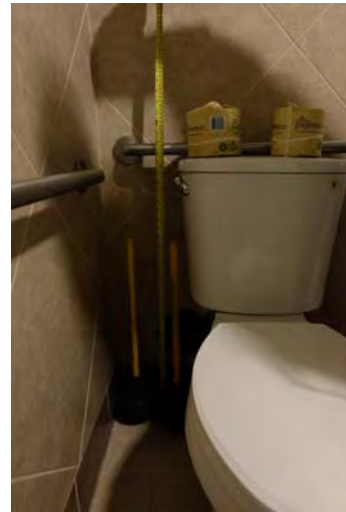
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Brookhurst # 0591



Brookhurst # 0592



Brookhurst # 0593



Brookhurst # 0597



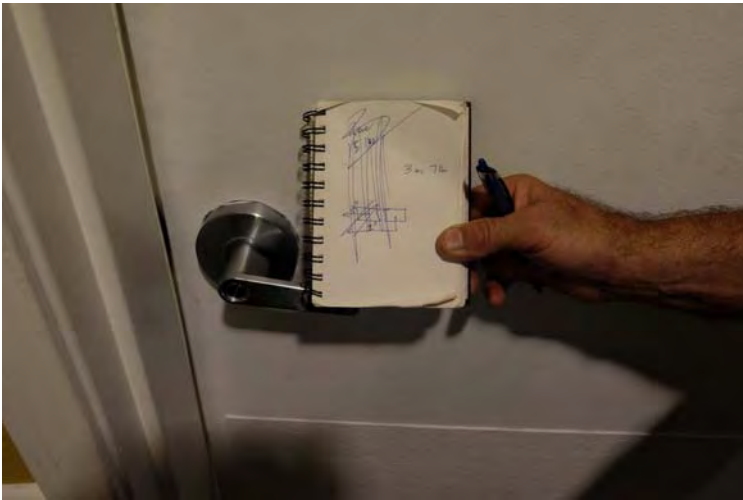
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Brookhurst # 0600



Brookhurst # 0606



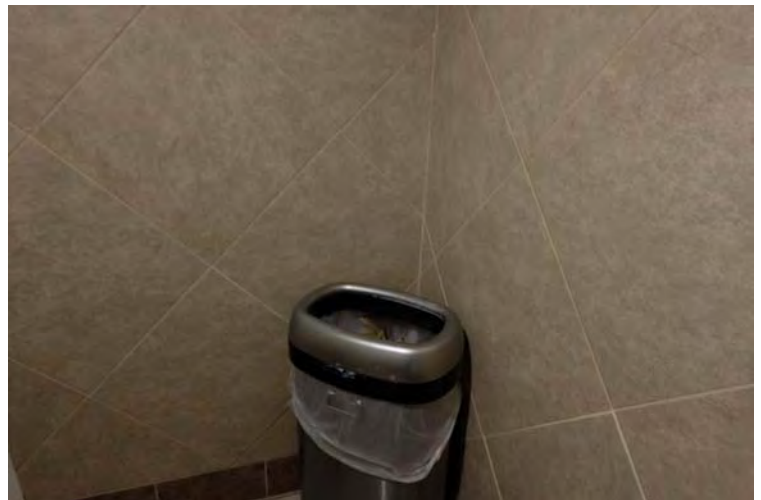
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Brookhurst # 0608



Brookhurst # 0609



Brookhurst # 0610



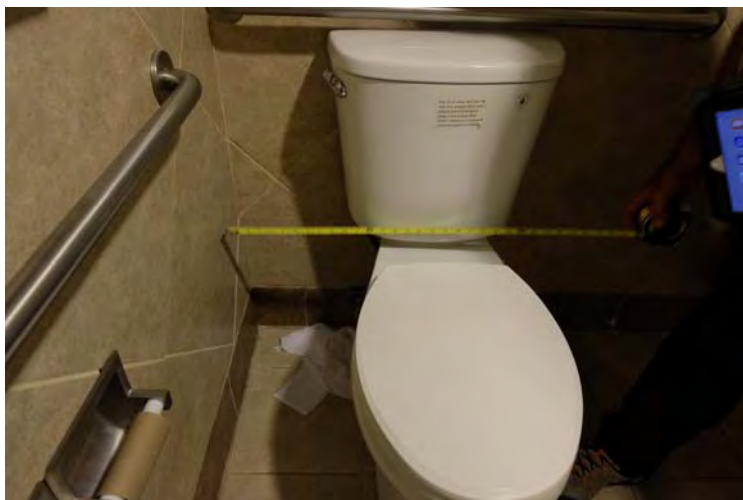
Brookhurst # 0615



Brookhurst # 0616



Brookhurst # 0617



Brookhurst # 0618



Brookhurst # 0624



Brookhurst # 0625



Brookhurst # 0626



Brookhurst # 0627



Brookhurst # 0628



Brookhurst # 0629



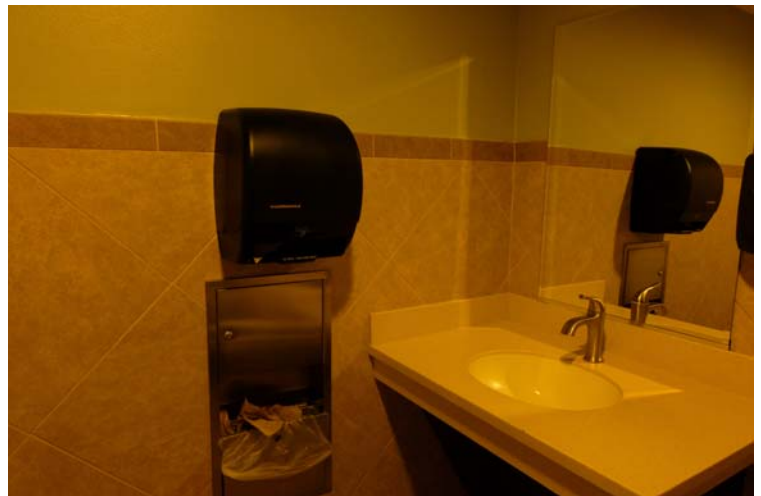
Brookhurst # 0630



Brookhurst # 0631



Brookhurst # 0632



Brookhurst # 0633



Brookhurst # 0634



Brookhurst # 0637



Brookhurst # 0639



Brookhurst # 0641



Brookhurst # 0642



Brookhurst # 0643



Brookhurst # 0644



Brookhurst # 0645



Brookhurst # 0646



Brookhurst # 0647



Brookhurst # 0648



Brookhurst # 0649



Brookhurst # 0650



Brookhurst # 0651



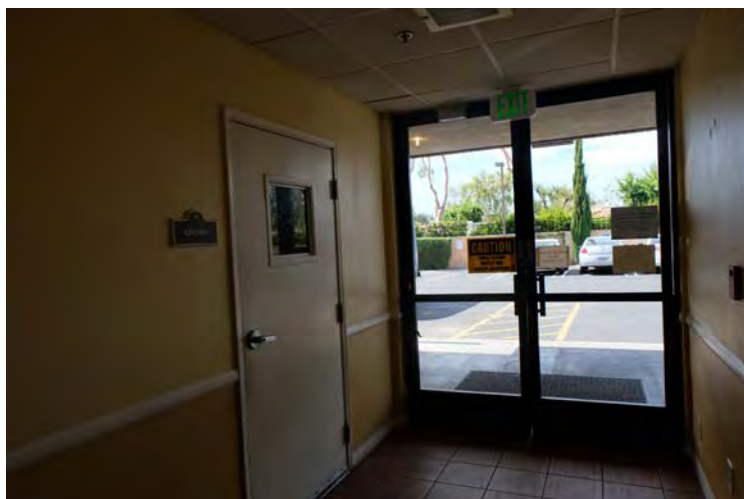
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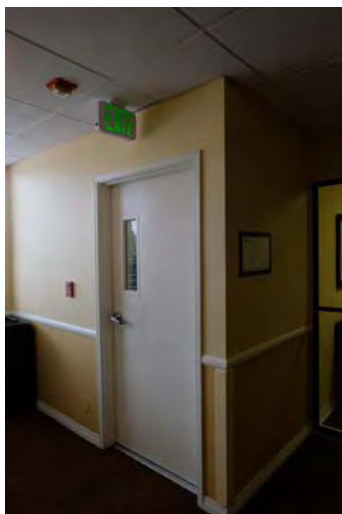
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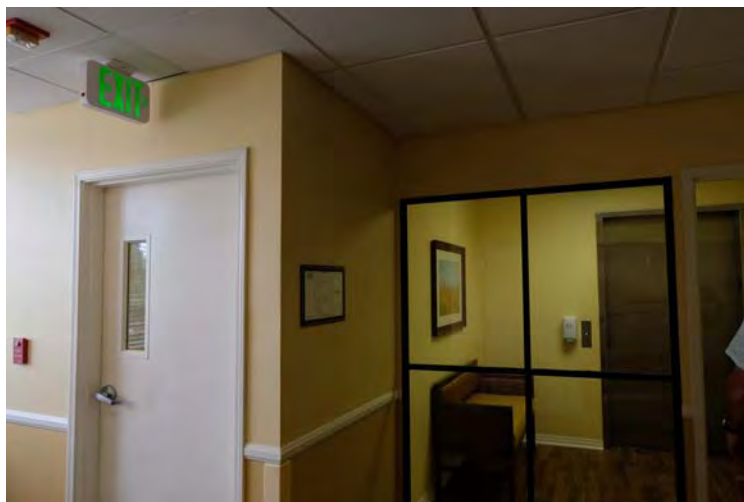
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Brookhurst # 0658



Brookhurst # 0659



Brookhurst # 0660



Brookhurst # 0661



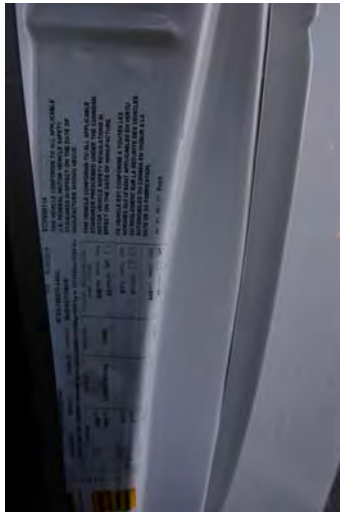
Brookhurst # 0662



Brookhurst # 0663



Brookhurst # 0664



Brookhurst # 0665



Brookhurst # 0666



Brookhurst # 0667



Brookhurst # 0668



Brookhurst # 0669



Brookhurst # 0670



Brookhurst # 0671



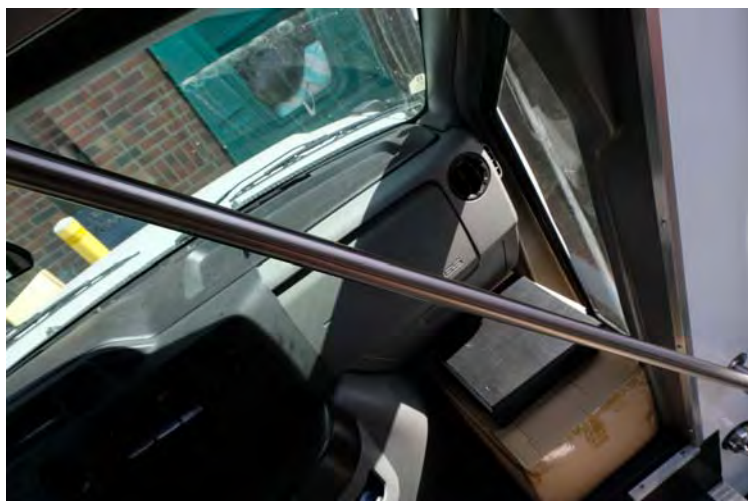
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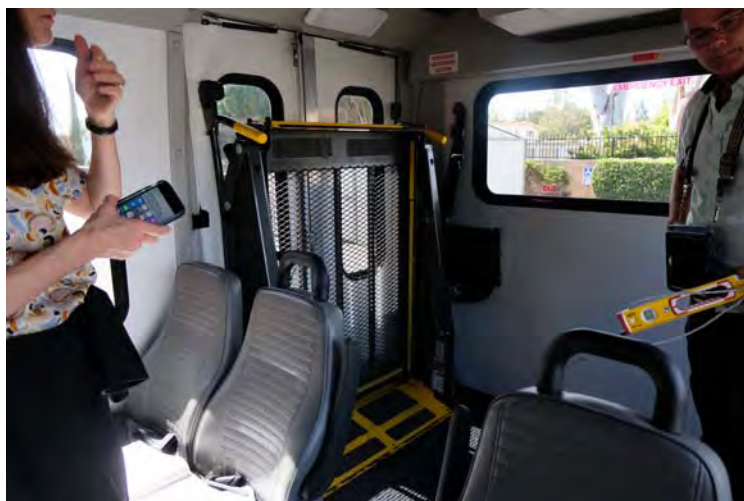
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Brookhurst # 0674



Brookhurst # 0675



Brookhurst # 0676



Brookhurst # 0677



Brookhurst # 0678



Brookhurst # 0679



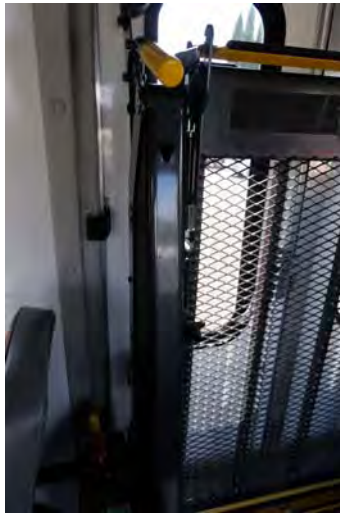
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Brookhurst # 0681



Brookhurst # 0682



Brookhurst # 0683



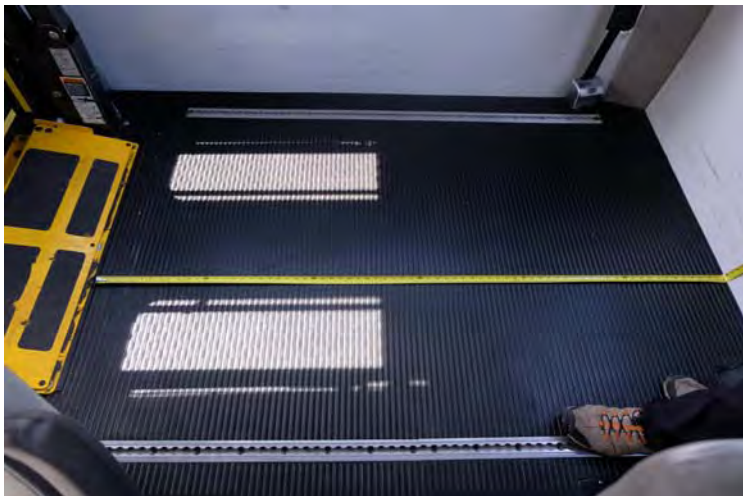
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Brookhurst # 0685



Brookhurst # 0686



Brookhurst # 0687



Brookhurst # 0688



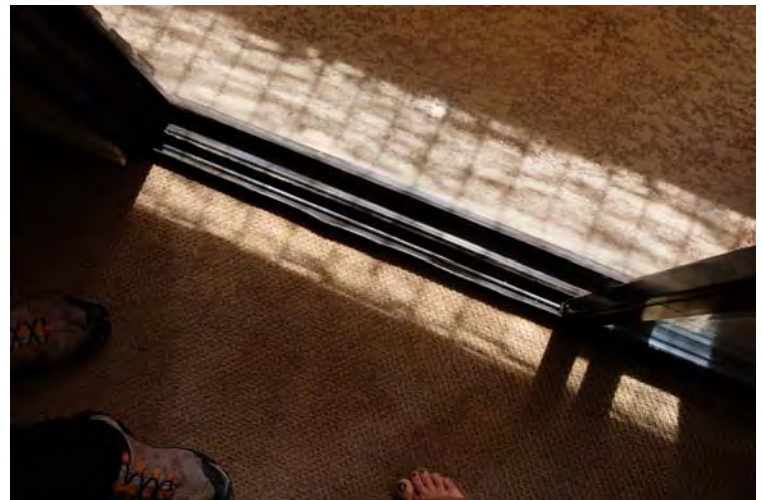
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Brookhurst # 0690



Brookhurst # 0693



Brookhurst # 0695



Brookhurst # 0696



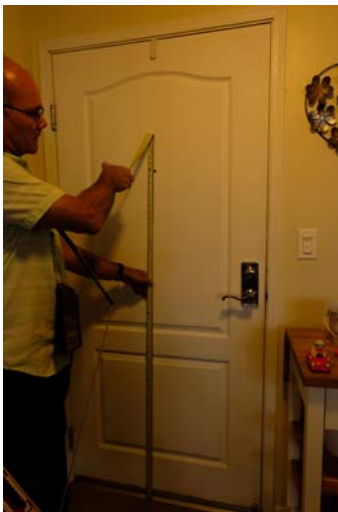
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Brookhurst # 0698



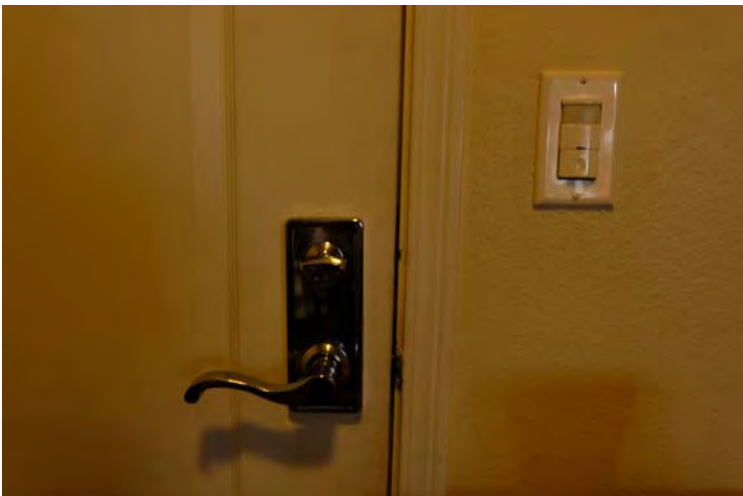
Brookhurst # 0700



Brookhurst # 0701



Brookhurst # 0702



Brookhurst # 0703



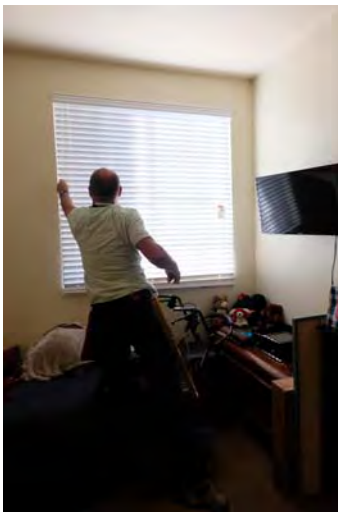
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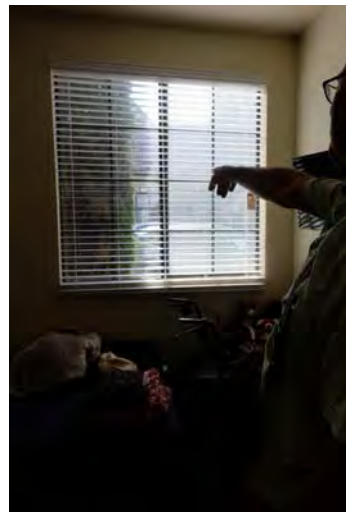
Brookhurst # 0707



Brookhurst # 0709



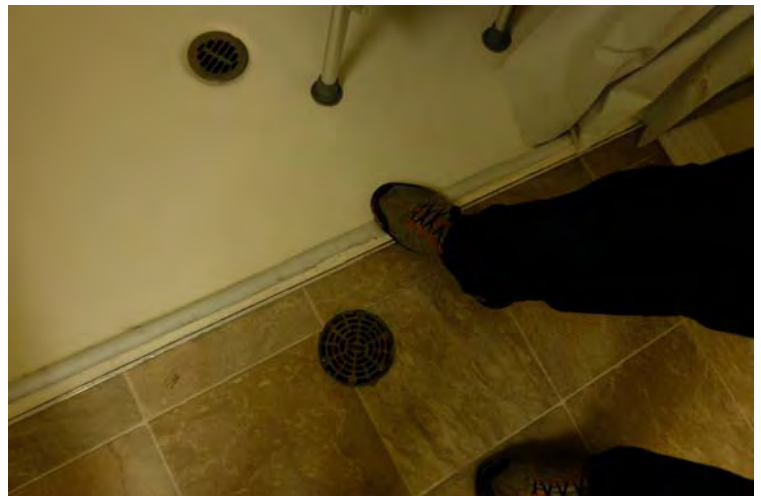
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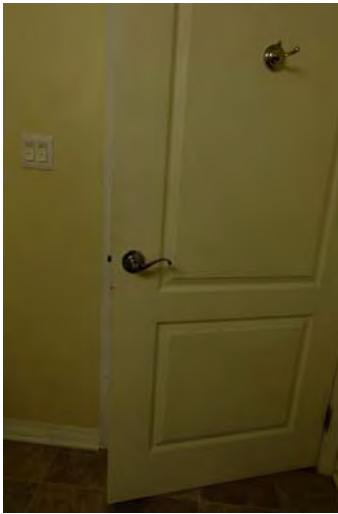
Brookhurst # 0712



Brookhurst # 0713



Brookhurst # 0718



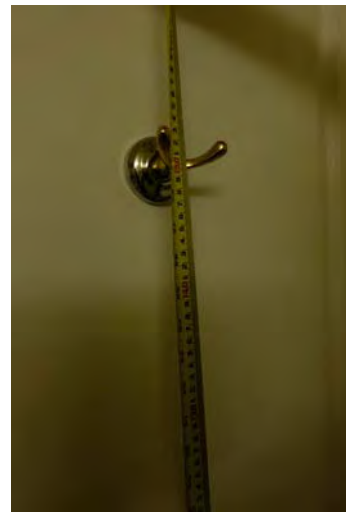
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Brookhurst # 0720



Brookhurst # 0721



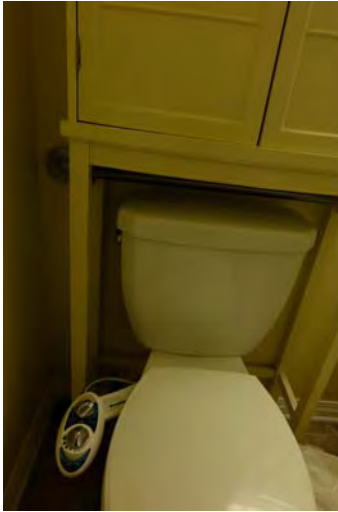
Brookhurst # 0722



Brookhurst # 0723



Brookhurst # 0725



Brookhurst # 0726



Brookhurst # 0727



Brookhurst # 0728



Brookhurst # 0729



Brookhurst # 0730



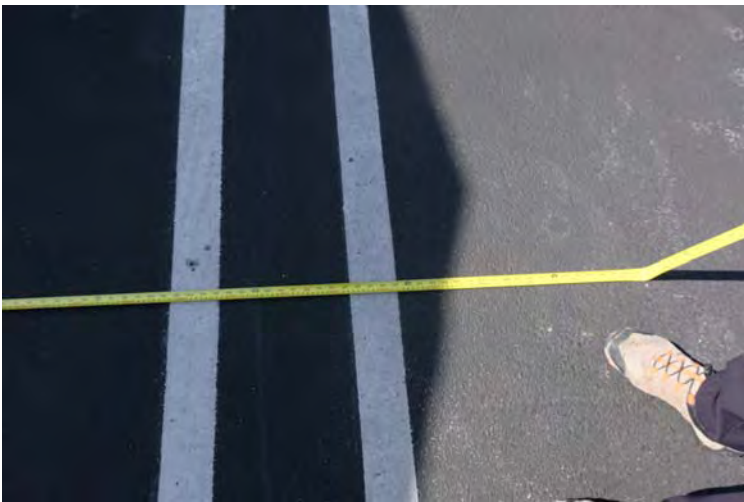
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Brookhurst # 0735



Brookhurst # 0736



Brookhurst # 0739



Brookhurst # 0743



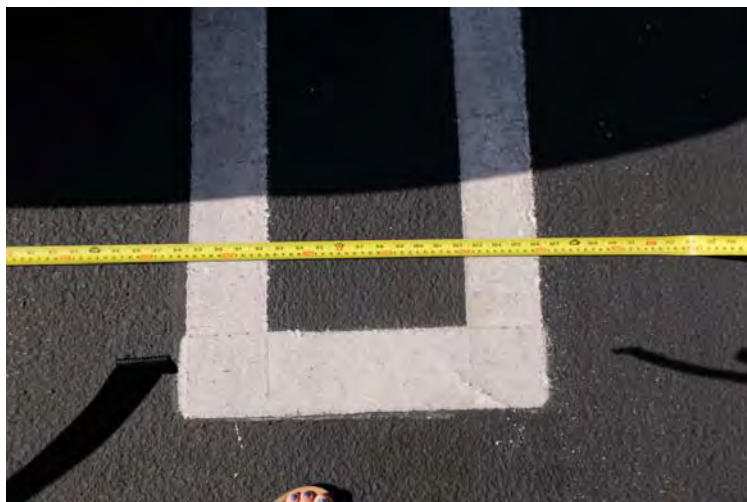
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Brookhurst # 0745



Brookhurst # 0747



Brookhurst # 0748



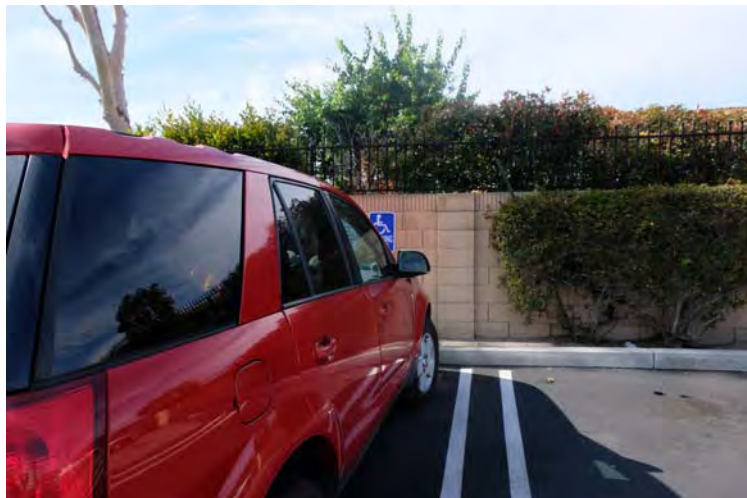
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Brookhurst # 0750



Brookhurst # 0751



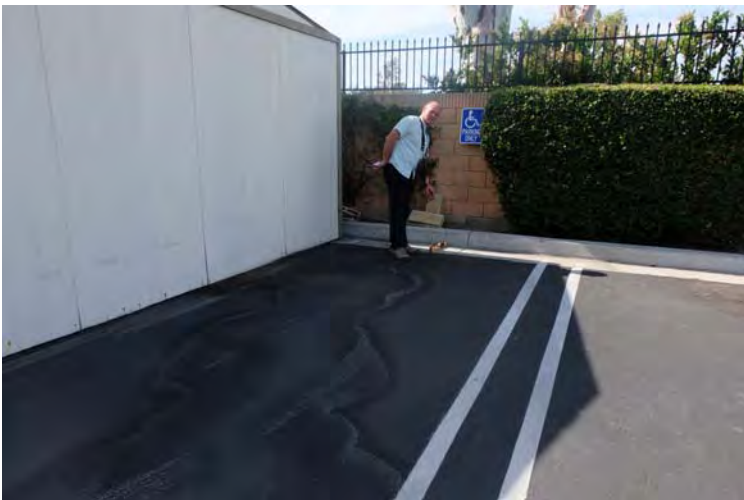
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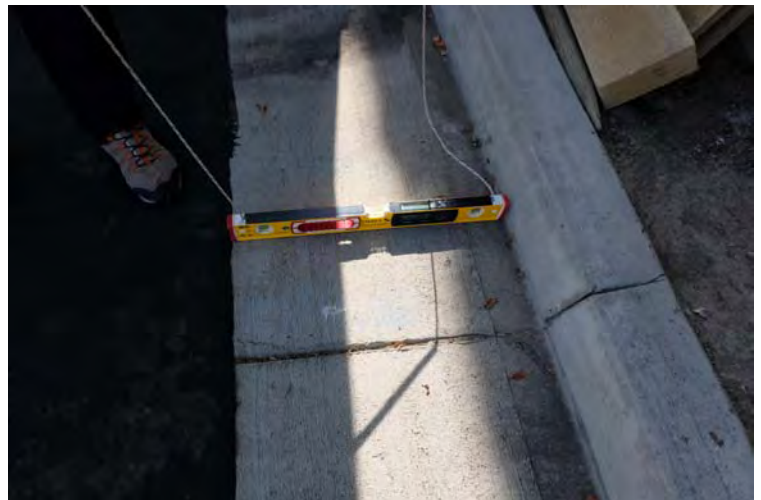
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Brookhurst # 0756



Brookhurst # 0757



Brookhurst # 0758



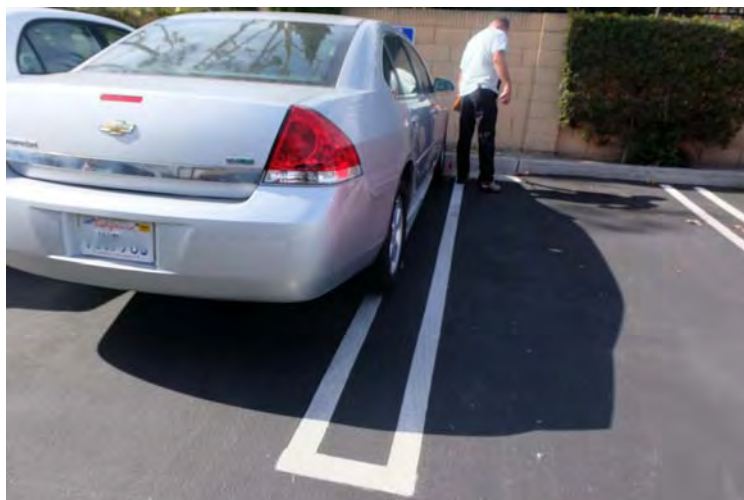
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Brookhurst # 0760



Brookhurst # 0761



Brookhurst # 0765



Brookhurst # 0766



Brookhurst # 0767



Brookhurst # 0768



Brookhurst # 0769



Brookhurst # 0771



Brookhurst # 0773



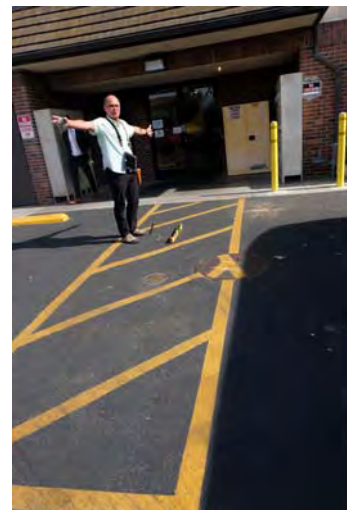
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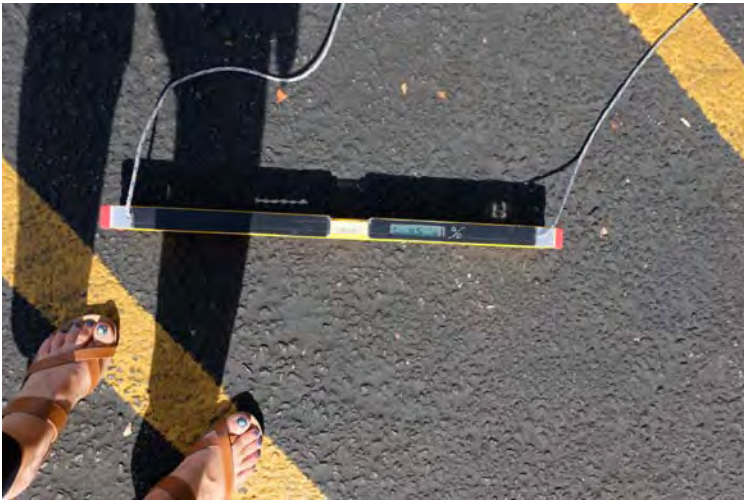
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Brookhurst # 0778



Brookhurst # 0779



Brookhurst # 0780



Brookhurst # 0781



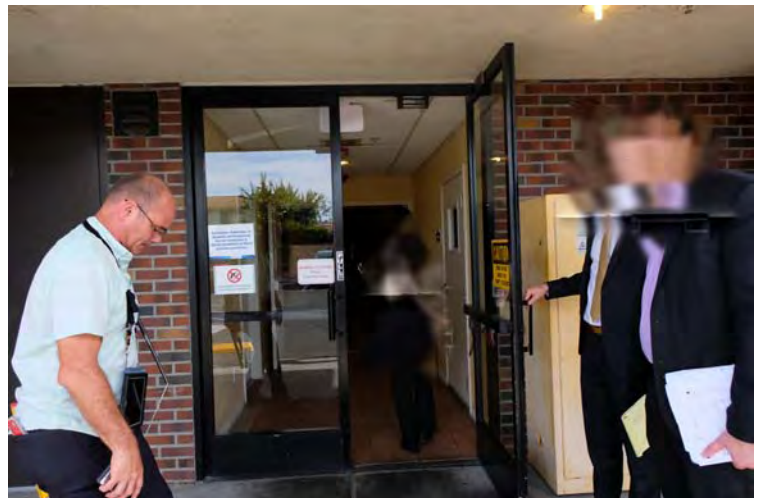
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Brookhurst # 0783



Brookhurst # 0784



Brookhurst # 0788



Brookhurst # 0789



Brookhurst # 0790



Brookhurst # 0791



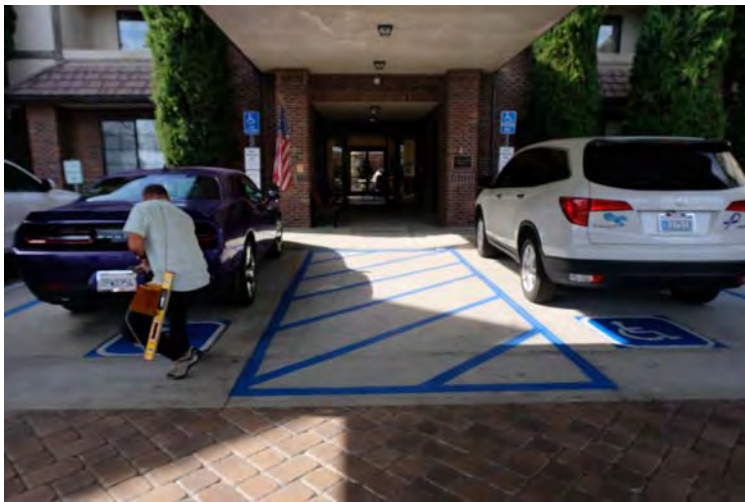
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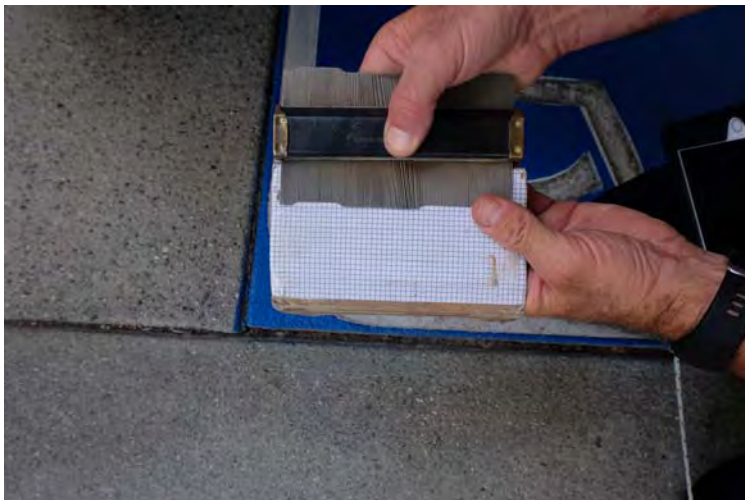
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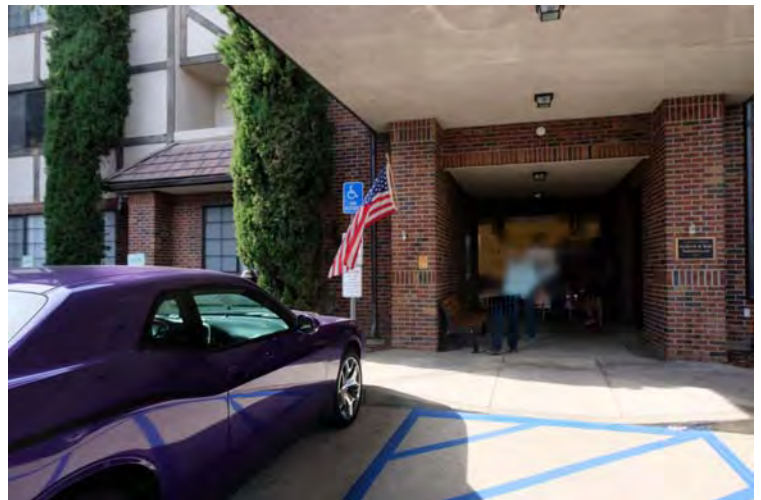
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Brookhurst # 0796



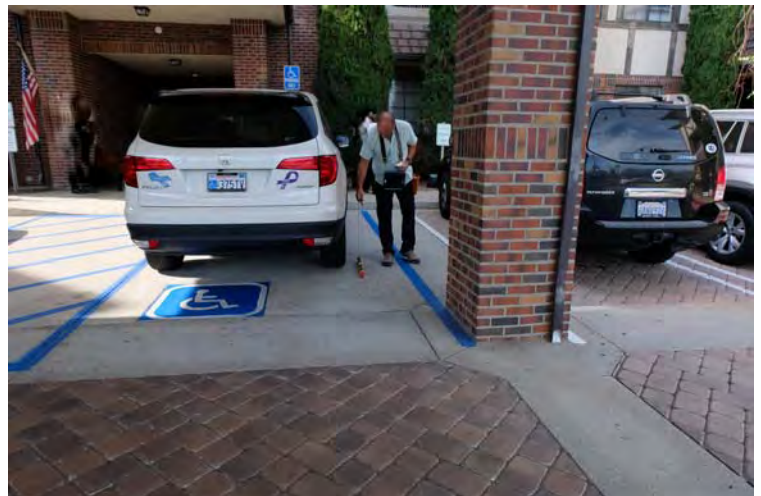
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Brookhurst # 0798



Brookhurst # 0799



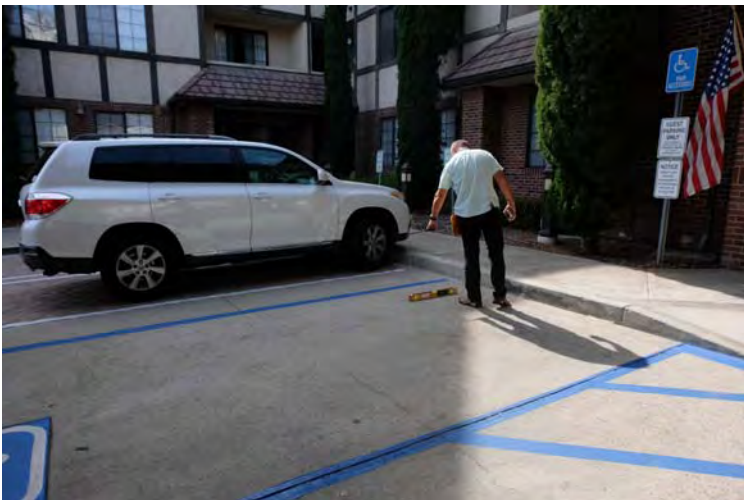
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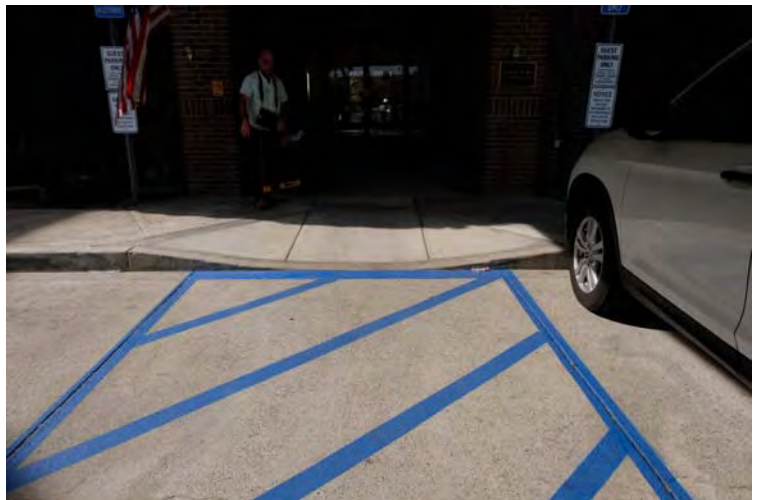
Brookhurst # 0801



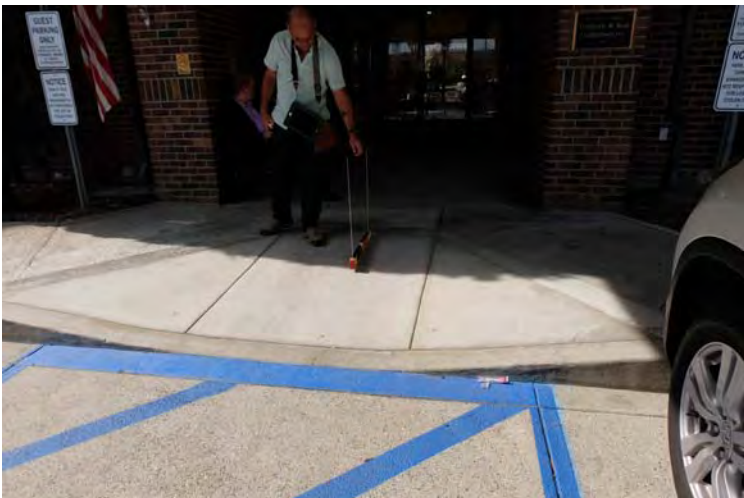
Brookhurst # 0802



Brookhurst # 0803



Brookhurst # 0804



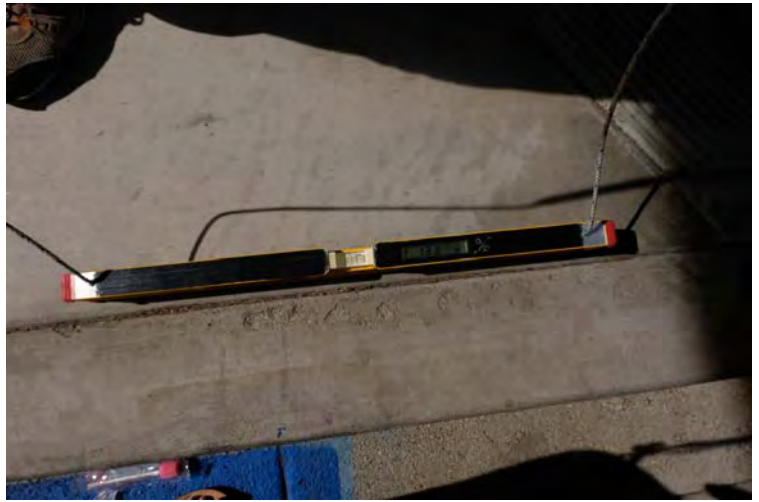
Brookhurst # 0805



Brookhurst # 0806



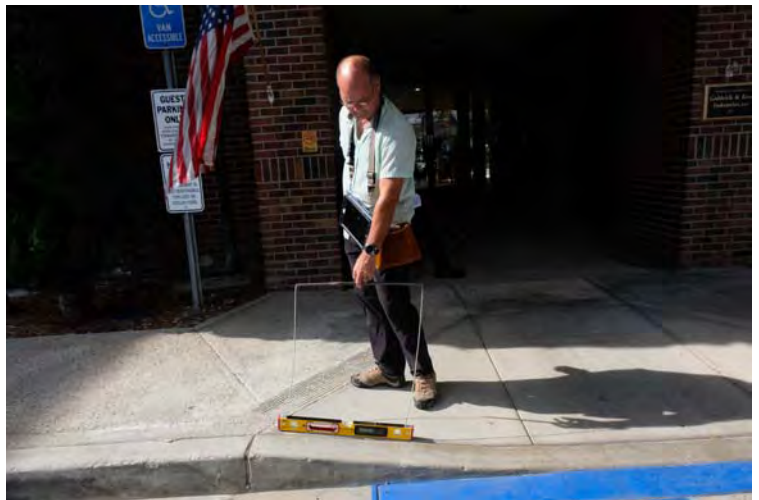
Brookhurst # 0808



Brookhurst # 0809



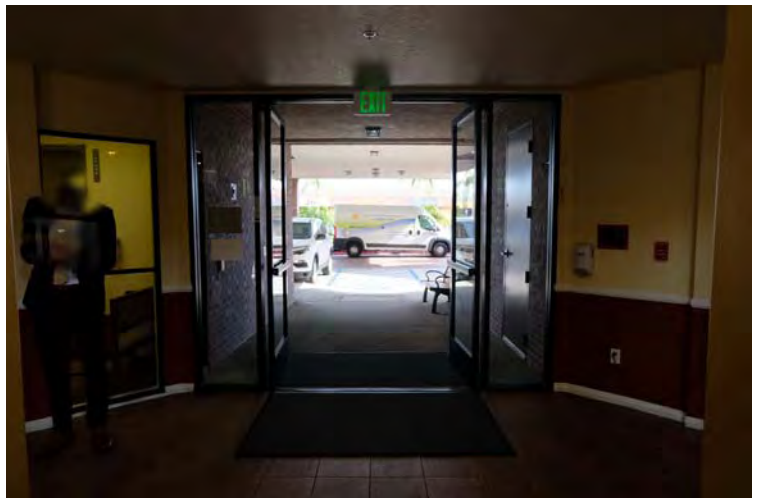
Brookhurst # 0810



Brookhurst # 0811



Brookhurst # 0812



Brookhurst # 0817



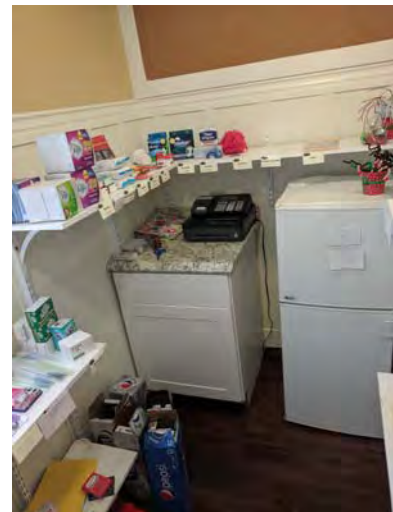
Brookhurst # 0820



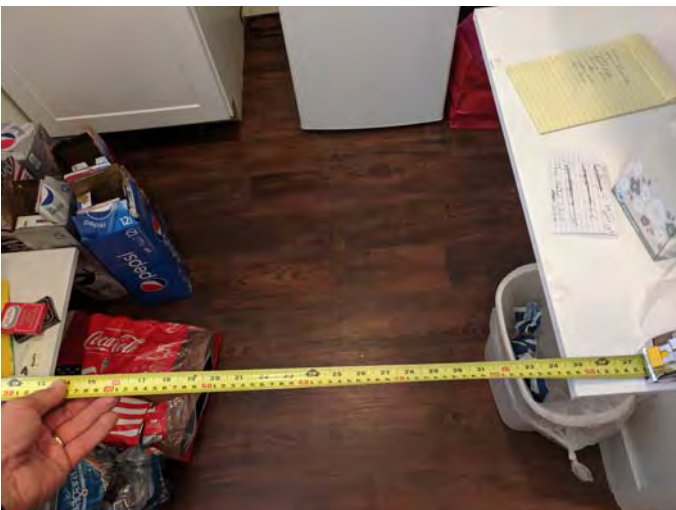
Brookhurst # 0821



Brookhurst # 0822



Brookhurst # 0823



Brookhurst # 0824



Brookhurst # 0825



Brookhurst # 0831